

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)  
(Consolidated Action)

DECLARATION OF J. GERALD HEBERT

Pursuant to 28 U.S.C. §1746, I, J. Gerald Hebert, declare that:

1. I am one of the attorneys who represented Marc Veasey and LULAC, *et al.* (hereafter “Veasey-LULAC Plaintiffs”) in the above-captioned case. The testimony set forth in this Declaration is based on first-hand knowledge, about which I could and would testify competently in open Court if called upon to do so, and on records contemporaneously generated and kept by my office in the ordinary course of its law practice. I make this Declaration in support of the Veasey-LULAC Plaintiffs’ motion for an award of attorneys’ fees and expenses.

2. I received a B.A. degree from Stonehill College in 1970 and graduated from Suffolk University School of Law in 1973. I am a member of the Virginia, D.C., and Pennsylvania (inactive) bars. I am also a member of the bar of the United States Supreme Court, the United States Courts of Appeals for the Second, Fourth, Fifth, Eighth, Eleventh and D. C. Circuits, the United States District Court for Eastern District of Virginia, and the United States District Court for the District of Columbia.

3. Following my graduation from law school, from 1973 until 1994, I served as a trial attorney in the Civil Rights Division of the United States Department of Justice in Washington, D.C. For the last fifteen years of my service at the Department of Justice (1979-1994), I was assigned to the Voting Section of the Civil Rights Division, where I worked exclusively on cases involving federally protected voting rights. While employed in the Voting Section from 1979 to 1994, I served in a number of supervisory capacities, including Special Litigation Counsel, Deputy Chief, and Acting Chief of the Voting Section.

4. While at the Department of Justice, I served as the lead trial attorney for the United States in numerous voting rights cases, a number of which ultimately became landmark cases in the field of voting rights. Cases that I handled at the Department of Justice that were the subject of United States Supreme Court decisions include: *City of Mobile v. Bolden*, *Rogers v. Lodge*, *Johnson v. DeGrandy*, *Presley v. Etowah County*, *City of Port Arthur, Texas v. U.S.*, and *Shaw v. Reno*. A complete listing of cases that I handled at the United States Department of Justice is attached to this Declaration as Exhibit A (Part 1).

5. Since leaving the Department of Justice in May 1994, I have been a sole practitioner with an office in Alexandria, Virginia, where I specialize in voting rights cases, especially redistricting cases and cases brought to enforce the Voting Rights Act of 1965, as amended. A listing of the cases I have handled in my solo practice is also set forth in Exhibit A (Part 2).

6. In addition, from 1994-1996, I served part-time as a staff attorney in the Voting Rights Project of the national office of the Lawyers' Committee for Civil Rights Under Law in Washington, D.C. In that position, I assisted with defense of constitutional challenges to majority-minority congressional districts under the *Shaw v. Reno* doctrine.

7. In addition to my solo practice, from July 2004 to 2016, I served as Executive Director and Director of Litigation at the Campaign Legal Center, a non-profit, non-partisan organization in Washington, D.C. In that capacity, I represented a party or *amicus curiae* in dozens of voting rights and campaign finance cases throughout the United States, including a number of cases decided by the United States Supreme Court (*e.g.*, *Gill v. Whitford*, *Wittman v. Personhuballah*, *Citizens United v. FEC*, *McComish v. Bennett*, *Davis v. FEC*, *McDonnell v. United States*, and *McCutcheon v. FEC*, among others). Since 2016, I was named Director and then in 2018 Senior Director of the Voting Rights and Redistricting Program at the Campaign Legal Center. Exhibit A (Part 3) is a listing of the voting rights, campaign finance and ethics cases I have worked on at the Campaign Legal Center.

8. From January 1995 to 2005, and from 2013 to the present, I have served as an Adjunct Professor of Law at Georgetown University Law Center in Washington, DC, where I have taught Election Law, which includes voting rights, campaign finance regulation, and other election law cases. In 1995, I also served as an Adjunct Professor of Law at American University's Washington College of Law, where I taught a course on the Voting Rights Act and the political process. In 1997, I co-taught a course on the Voting Rights Act at the University of Virginia Law School with nationally renowned Professor Pamela Karlan.

9. I have written a number of publications, books, and articles on the Voting Rights Act or redistricting. For example, in 2000, I co-authored a book on redistricting with former United States Solicitor General Donald B. Verrilli, along with several other attorneys at Jenner and Block (including Paul Smith, Sam Hirsch and Heather Gerken, now Dean at Yale Law School). That book was entitled "The Realists' Guide to Redistricting", which was published by the American Bar Association in 2000, and republished in 2010. I have also authored several law journal

articles. Several of these have been co-authored with other counsel, or academic scholars who have served as expert witnesses in voting rights cases. My law journals include the following: Yale Law and Policy Journal, “Voting Is Speech”, Vol. 34, Issue 2 (2016) (co-authored); Yale Law and Policy Journal, “The Need For State Redistricting Reform To Rein In Partisan Gerrymandering”, Vol. 29, Issue 2 (2011); Rutgers Law Journal (co-authored); “Redistricting in the Post-2000 Era”, George Mason University Law Review, Volume 8, Number 3 (Spring 2000); “General Theory of Vote Dilution”, La Raza Law Journal, Boalt Hall School of Law; University of California at Berkeley (Vol. 6, No. 1)(1993)(co-authored); Future of Voting Rights Litigation: Elections at the Legislative Level, La Raza Law Journal, Boalt Hall School of Law (Vol. 6, No. 1)(1993); Keeping The Courts Honest: The Role of Historians as Expert Witnesses in Southern Voting Rights Cases Southern University Law Review (Vol. 16, No. 1)(Spring 1989)(co-authored); Civil Rights Law: High Court Decision on Voting Rights Act Helps To Remove Minority Barriers National Law Journal (November 1986); and Discriminatory Electoral Systems and the Political Cohesion Doctrine, National Law Journal (Vol. 10, No. 4)(1987) (co-authored). I also have written several articles about voting rights for publications that are geared to state and local governments, including publications by the Texas Municipal League and the Nation’s Cities Weekly.

10. I have lectured before numerous meetings and conventions held by bar and other organizations on voting rights, reapportionment, and civil rights, including the National Conference of State Legislatures, the Association of Southern State Legislatures, the Virginia Association of Local Government Attorneys, the American Constitution Society, and reapportionment authorities in the States of Louisiana, Maryland, New Mexico, Texas, and Virginia, among others. I have also given lectures or participated as a panelist and made

presentations on voting rights law and issues at Columbia University School of Law, Yale Law School, Harvard Law School, Washington and Lee University Law School, University of Richmond Law School, William and Mary Law School, Duke University Law School, and Seton Hall Law School, among others.

### **The Veasey-LULAC Litigation Team**

11. The Veasey-LULAC litigation team has played a leading role in this litigation from its filing date on June 26, 2013.<sup>1</sup> In this section of my declaration, I explain how I assembled and managed the Veasey-LULAC litigation team to create a both highly effective and efficient team.

12. I was in the U.S. Supreme Court the day that Chief Justice Roberts announced the decision of the Court in *Shelby County v. Holder*—a case that invalidated the preclearance formula of the Voting Rights Act and therefore lifted the preclearance regime on previously covered states such as Texas.

13. Texas's voter photo ID law SB 14 had been blocked by a D.C. three-judge court decision denying it preclearance. I had served as counsel for Congressman Veasey and others as Defendant-Intervenors in that preclearance case.

14. I knew that there was a likelihood that, as a result of the *Shelby County* decision, Texas would begin to implement SB 14 immediately even though it had been found to be discriminatory in its effect.

15. Chad Dunn—an attorney with whom I had litigated several voting cases, including the SB14 preclearance case—was with me that day in the U.S. Supreme Court. Upon leaving the

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<sup>1</sup> The Veasey-LULAC plaintiffs were the first plaintiffs to sue to enjoin SB 14 in the aftermath of *Shelby County v. Holder*.

U.S. Supreme Court, we discovered that then-Attorney General Greg Abbott had already announced Texas's decision to begin enforcing SB 14 in the wake of *Shelby County*.

16. Mr. Dunn and I immediately recognized the need for a new lawsuit to enjoin SB 14 and prevent its discriminatory results on Texas voters' access to the ballot box. We agreed to work together quickly and form a legal team to prosecute this case. I took on the task of discussing the matter in detail with our clients in the prior preclearance case, while Mr. Dunn took responsibility for drafting a complaint based on the facts already available from the preclearance case.

17. I advised Mr. Dunn that we should assemble a trial team that would employ attorneys with different skill sets. Since I had managed several pieces of major litigation in my twenty-one years as a voting rights attorney at the U.S. Justice Department and my additional twenty years in private practice enforcing the Voting Rights Act, I felt that my skill set could best be utilized as the overall manager of the litigation. In that role, I would oversee the case, ensure that all attorneys on the team were aware of and adhered to all deadlines, and I would be ultimately responsible for making all assignments to the legal team to ensure that there was no duplication of work or legal services performed. It was agreed that Mr. Dunn, who has tremendous trial experience, would be lead trial counsel, taking the lead through discovery and at trial.

18. Because I knew that I had two recently law graduates serving back-to-back legal fellowships at my office (Campaign Legal Center), Mr. Dunn and I agreed that we would let these attorneys do the bulk of the initial drafting of motions, briefs and other legal papers. This would ensure that time-consuming legal research and writing would be undertaken in the first instance by attorneys who would bill at a lower hourly rate. I knew that both of these recent law school

graduates—Emma Simson and Josh Bone—had exceptional writing skills. Indeed, both went on to clerk for U.S. Supreme Court Justice Ruth Bader Ginsburg. When both of these younger attorneys moved on to their respective clerkships, Ms. Danielle Lang joined the Campaign Legal Center following her clerkship with the Ninth Circuit Court of Appeals and two years litigating cases in California as a Skadden Fellow. Since late 2015, Ms. Lang has been primarily responsible for preparing the initial drafts of all motions and briefs, the same role played earlier by Ms. Simson and Mr. Bone.

19. I also advised Mr. Dunn that we should ask Armand Derfner to join the legal team. I had worked with Mr. Derfner for over thirty years on voting rights cases. He enjoys a national renowned reputation as one of the best constitutional scholars and legal strategists in the United States. Mr. Dunn and I agreed that if Mr. Derfner was willing to join the legal team, he would serve as chief legal strategist throughout the litigation, and that his vast experience would be invaluable assets to our clients. Fortunately, he agreed to do so.

20. Finally, we knew that we would need additional trial attorneys to assist with the massive discovery and trial effort in front of us. Mr. Dunn suggested that we add his law partner Scott Brazil as well as another Texas-based attorney Neil Baron, both of whom have significant trial experience and could assist with discovery and trial preparation. As the case proceeded, both Mr. Brazil and Mr. Baron handled written discovery and took or defended depositions. By ensuring that Texas-based attorneys handled those matters, it ensured that out-of-state counsel did not have to spend additional time and expense traveling to Texas handling such matters.

21. Assembling this trial team for the Veasey-LULAC plaintiffs ensured that we could be prepared for trial in the Fall of 2014. The Court will no doubt recall that Texas sought

to delay the trial beyond 2014 (as did other parties). Only the Veasey-LULAC Plaintiffs strongly objected to the delay and this Court agreed that delay was not in the interest of Texas voters. The trial took place in September 2014 and this Court ordered relief prior to the 2014 elections.

22. The Veasey-LULAC litigation team was the first to file this landmark Section 2 litigation against SB 14 on June 26, 2013 and has led the plaintiffs in prosecuting this action ever since. As mentioned above, in 2013, the Veasey-LULAC team pursued an aggressive litigation schedule to ensure effective relief as soon as possible. During discovery, our litigation team took or defended dozens of depositions. At trial, we presented the live testimony of 14 witnesses, including plaintiffs and several experts, as well as deposition testimony of several Veasey-LULAC witnesses. The Veasey-LULAC team also cross-examined most of the Defendant's witnesses. Throughout the litigation, our team reviewed voluminous documents, litigated numerous discovery disputes, drafted extensive findings of fact and conclusions of law, and briefed complex legal issues. During all three appellate arguments, Mr. Dunn was an oral advocate for the Veasey-LULAC plaintiffs in the Fifth Circuit.

23. In 2016, the Veasey-LULAC plaintiffs were the only parties to seek relief from the Supreme Court to lift the 2014 stay ordered by the Fifth Circuit of this Court's remedial order. While the Supreme Court did not grant that motion, it issued an Order that gave the Fifth Circuit until July 20, 2016 to resolve the matter in the first instance. Absent Fifth Circuit action by July 20, the Supreme Court invited the Veasey-LULAC plaintiffs to re-urge their motion to dissolve the stay. On July 20, 2016, the Fifth Circuit *en banc* court issued its ruling upholding this Court's determination that SB 14 violated Section 2 of the Voting Rights Act. The Supreme Court's Order secured by the Veasey-LULAC plaintiffs in 2016 had a profound positive effect



on this litigation and ultimately ensured that there would be relief afforded all plaintiffs for the 2016 elections.

### **Campaign Legal Center's Fee Application**

24. I submit this declaration in support of an application for my attorneys' fees as well as the reasonable fees of my Campaign Legal Center colleagues Josh Bone, Emma Simson, and Danielle Lang, and the costs incurred by Campaign Legal Center. In sum, Campaign Legal Center seeks \$782,160.00 in attorneys' fees.

25. Campaign Legal Center seeks its fees for tasks related to: (1) litigating this case through the denial of Texas's petition for certiorari from the *en banc* decision; (2) negotiating, implementing, and monitoring the 2016 interim remedial order; (3) time spent defending against Texas's unwarranted 2018 "motion to dismiss," which unsuccessfully asked this Court to re-litigate merits' determinations and overturn the Fifth Circuit's ruling on mootness, Doc. 1107, and (4) the instant attorneys' fees motion.

26. Campaign Legal Center is a non-profit non-partisan organization dedicated to vindicating the voting rights of all eligible Americans. Except in rare circumstances, we do not bill our clients for our legal services and did not do so in this case.

27. In support of the fee application, Campaign Legal Center submits contemporaneous billing records for Danielle Lang, Emma Simson, Josh Bone, and me. These billing records are attached as Exhibit B. Exhibit B is true and accurate, and is based on contemporaneous records of the activities in the case maintained as business records in my office. The records include information by attorney name, date of work, time billed, and a narrative description of the work completed.

28. I have reviewed the time entries for the time that I have expended in this case. I have also reviewed and approved the time entries for the other Campaign Legal Center attorneys that worked on this matter with me. The hours expended were necessary in rendering legal services to the Veasey-LULAC Plaintiffs in this case.

29. In compiling our attorneys' fees, we used significantly reduced rates, excluded numerous staff members and timekeepers that worked on this matter, and include only a portion of the work actually performed.

30. **Reduced Rates:** The rates reflected for each CLC attorney's work in the Billing Records are based on the 2018-2019 rate schedule for attorneys' fees adopted by the United States Attorney's Office for the District of Columbia. See <https://www.justice.gov/usao-dc/file/796471/download>. The rate applied in the Billing Records for each attorney in any given year is based on that attorney's years of experience at the time that the work was performed. After reviewing these rates, I find them to reasonable and below the market rate for attorneys in our office.

31. My hourly rate in this case is \$613 per hour. I believe this rate is reasonable given my considerable experience (over 40 years) litigating voting rights cases, the complexity and novelty of the issues in this case, and the considerable public importance of this matter.

32. Both Emma Simson and Josh Bone's rates in this case are \$307 per hour. As recent law graduates but exceptional attorneys working on drafting sophisticated pleadings and briefs, I believe these rates are reasonable as well.

33. Emma Simson graduated from Yale Law School in 2013. She also holds a Masters of Science from the University of Oxford. Ms. Simson worked for Campaign Legal Center from 2013 through the trial in this case in 2014. After her time at Campaign Legal Center, she clerked

for the Honorable Ruth Bader Ginsburg of the U.S. Supreme Court, the Honorable David S. Tatel of the U.S. Court of Appeals for the District of Columbia Circuit and the Honorable James E. Boasberg of the U.S. District Court for the District of Columbia. She is now a senior associate at the law firm WilmerHale in Washington, D.C.

34. Josh Bone graduated from Yale Law School in 2013. Prior to joining Campaign Legal Center, Mr. Bone clerked for the Honorable David S. Tatel of the U.S. Court of Appeals for the District of Columbia Circuit. After spending a fellowship year at Campaign Legal Center, Mr. Bone clerked for the Honorable Ruth Bader Ginsburg of the U.S. Supreme Court. Mr. Bone is now an associate at Goodwin Law in Boston.

35. Danielle Lang's rate in this case is \$351 per hour. Given her clerkship and litigation experience prior to joining CLC and her experience working on this case and numerous other voting rights matters, I believe her rate is reasonable as well.

36. Danielle Lang graduated from Yale Law School in 2012. From 2012 to 2013, Ms. Lang clerked for the Honorable Richard A. Paez of the U.S. Court of Appeals for the Ninth Circuit. From 2013 to 2015, Ms. Lang served as a Skadden Fellow in the Employment Rights Project of Bet Tzedek Legal Services in Los Angeles, where she represented low-wage immigrant workers in wage and hour, discrimination and human trafficking matters. As a labor attorney, Ms. Lang handled complex class-action and federal court litigation. Ms. Lang joined Campaign Legal Center in 2015 and has since managed numerous voting rights cases in district court, appellate court, and the U.S. Supreme Court. She most recently successfully defended a jury verdict in a public ethics case against an appeal in the Fifth Circuit Court of Appeals. After three years at Campaign Legal Center, Ms. Lang manages a staff of several attorneys and serves as the co-director of the voting rights and redistricting program. Ms. Lang also teaches, as an adjunct

professor, an Election Law Practicum with Mr. Hebert at Georgetown University Law Center. Ms. Lang is a member of the District of Columbia, New York and California bars, as well as the bars of the U.S. Supreme Court, the U.S. Court of Appeals for the Fifth Circuit, Ninth Circuit, and Eleventh Circuit and the U.S. District Court for the Central District of California.

37. All Campaign Legal Center attorneys have exercised reasonable billing judgment in this case. For example, I have excluded from my fee nearly 100 hours of time for which I believe I could be properly compensated. Likewise, we have excluded 123.7 hours of Ms. Simson's compensable time, 75.4 hours of Mr. Bone's compensable time, and 48.5 hours of Ms. Lang's compensable time. We also have sought to limit our time to those hours we spent directly working on material aspects of the litigation. For example, we have excluded travel time and handling other administrative matters that did not involve substantive work connected to the litigation.

38. Moreover, Campaign Legal Center has excluded hundreds of hours spent by other attorneys (including Paul Smith and Mark Gaber), legal fellows, law interns, paralegals, and administrative staff that contributed to this case but are outside the core legal team outlined above. For example, another attorney in our office, Jonathan Diaz, spent significant time assisting in the briefing for this fee motion but his time has not been included here.

39. Counsel in this case spent significant time discussing matters by phone to eliminate redundancies elsewhere. In order to ensure we did not overcharge for this time among the Veasey-LULAC legal team, we agreed that for purposes of the Veasey-LULAC plaintiffs' fee motion, only one team member would include their time on any given call. As such, Mr. Derfner has included his time on calls among our Veasey-LULAC team because he was our lead legal strategist. As the team manager, I have included some (although not all) of my time spent

on calls with our cooperating counsel representing the DOJ and other Private Plaintiffs. As such, while many of the Veasey-LULAC legal team joined such calls among counsel, we have excluded most of that time.

40. I also have not billed for any of the work I performed (pre-complaint) in preparing the case (pre-complaint). That included numerous hours litigating Texas's unsuccessful lawsuit in the U.S. District Court in the District of Columbia to obtain Section 5 preclearance of its photo ID law (S.B. 14). In the D.C. case, the three-judge court found that Texas was unable to show the absence of a racially discriminatory effect with respect to S.B. 14. I attach hereto as Exhibit C my time sheets for my work on that lawsuit for which I never received an award of attorneys' fees.

41. To further reduce the number of attorney hours needed to litigate this case, I requested that my co-counsel, Mr. Dunn, serve as the person primarily responsible to keep clients reasonably informed about the status of case and significant developments, which Mr. Dunn did throughout this case. I have excluded from my time records nearly all my communications with the client group, particularly my numerous contacts with plaintiffs Veasey, Hamilton and LULAC representatives. Ongoing and updated communications with clients in a case of this nature, given the high profile nature of this case as well as the size and geographic diversity of the client group, were necessary. Mr. Dunn assumed primary responsibility for undertaking timely communication with the clients as the most cost-effective way of fulfilling those requirements.<sup>2</sup>

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<sup>2</sup> Both the Texas Rules of Professional Conduct and the Virginia Rules of Professional Conduct (I am a member of the Virginia bar) require lawyers to keep their clients reasonably informed about the case and to comply promptly with clients' requests for information about the status of the case. This obligation includes providing clients with status reports on the lawsuit, as well as communications from other

42. I also have reviewed the time records (and expense listings) for work performed by my co-counsel at the law firm of Brazil and Dunn, the Derfner-Altman law firm, and the Law Offices of Neil Baron. All of the work set forth in the Declarations of my co-counsel were necessary to the litigation of this case and were not duplicative of any of the work I did. I made a conscientious effort to avoid duplication of work by agreeing, in advance, with my co-counsel on a division of labor in those instances where more than one attorney worked on the case simultaneously.

43. As manager and overseer of this case for the legal team, I also took responsibility for ensuring that the time spent in preparing this fee motion and brief in support thereof, would be primarily handled by Ms. Lang so as to minimize the amount of fees involved in its preparation. I have not billed for any of my time (over twenty hours) that I have spent preparing this Declaration, reviewing the brief in support of the plaintiffs' motion for an award of attorneys' fees and expenses, or communicating with all private plaintiffs' counsel regarding the various motions for attorneys' fees.

44. I also carefully monitored expenses to insure that only necessary and reasonable costs were incurred. CLC is seeking \$114,533.37 in reasonable expenses and costs. These expenses are outlined in Exhibit D. Of the total, CLC seeks reimbursement for \$43,990.87 it has already paid out of pocket, which includes certain expert witness costs, travel, printing and production, and postage costs. These expenses were incurred by the Campaign Legal Center to successfully prosecute this case, and are the type of expenses normally billed by me and other law firms to fee-paying clients.

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parties that may significantly affect settlement or resolution of the case. See Texas Rules of Professional Conduct (Rule 1.03) and Virginia Rules of Professional Conduct (Rule 1.04).

45. The Veasey-LULAC Plaintiffs' retained seven experts addressing six different types of expert evidence (all of which were relevant to Plaintiffs' Section 2 claim): Dr. Lichtman (Senate Factors and Intent), Dr. Herron (database matching), Drs. Barreto/Sanchez (survey research), Mr. Cornish (appropriation funding for implementation), Mr. Wood (ease in discovery of in-person voter fraud), and Mr. Korbel (history of discrimination) all of whom testified at trial and contributed in important ways to the record in this case. The Court ordered the state pursuant to Fed. R. Civ. Pro. 56 to pay these experts for their time and expense attending deposition; the amount the state had already paid are excluded from this Motion. The following balances remain owed: Dr. Lichtman \$28,800, Dr. Sanchez \$10,000, Dr. Barreto \$10,000, and Mr. Korbel \$21,742.50. These amounts total the remaining \$70,542.50 of CLC's total cost and expense request of \$114,533.37. Invoices to reflect these balances are included in Exhibit D.

46. I declare under penalty of perjury that the foregoing is true and correct.

/s/ J. Gerald Hebert  
J. GERALD HEBERT

Dated: April 11, 2019

## **EXHIBIT A**



**EXHIBIT A TO HEBERT DECLARATION IN SUPPORT OF  
VEASEY-LULAC MOTION FOR AN AWARD OF  
ATTORNEYS' FEES, EXPENSES AND COSTS**

**Part I**

**Voting Rights Cases In Which J. Gerald Hebert  
Has Served As Legal Counsel for the United States**

Listed below are cases in which I have appeared as legal counsel. I have divided the cases into two categories: 1) those cases where I served as lead attorney for the Government and the Government was a *party* to the lawsuit; and 2) those cases where I served as lead attorney for the Government and the Government participated as *amicus curiae*. Cases marked with an asterisk \* are cases involving Section 2 of the Voting Rights Act, those marked with a double asterisk \*\* are Section 4 or 5 Voting Rights Act cases, and those marked with a triple asterisk \*\*\* are language minority cases under the Voting Rights Act (Section 203 cases).

**1. Voting rights cases where Hebert served as lead counsel for the United States in the trial court and the United States was a party to the litigation:**

Bolden and United States v. City of Mobile, 446 U.S. 55 (1980)

Johnson v. DeGrandy, 512 U.S. 997 (1994) \*

County Council of Sumter County, South Carolina v. United States, 555 F. Supp. 694 (D.D.C. 1983) (3-judge court) \*\*

Shaw v. Barr, C.A. No. 92-202-CIV-5-BR (E.D.N.C. 1992) (three-judge court), reversed sub nom. Shaw v. Reno, 113 S. Ct. 2816 (1993)

City of Port Arthur, Texas v. U.S., 459 U.S. 159 (1982) \*\*

Brown and United States v. Board of School Commissioners of Mobile County, 706 F.2d 1103 (11th Cir. 1983)

United States v. Dallas County Commission, 850 F.2d 1430 (11th Cir. 1988)\*

United States v. Marengo County Commission, 811 F.2d 619 (11th Cir. 1987) \*

United States v. State of South Carolina and Horry County, C.A. No. 79-2467-5 (D. So. Car.) (three-judge court) \*\*

State of Mississippi v. United States, No. 87-3464 (D.D.C.)(three-judge court) \*\*

United States v. State of Georgia, No. 1:90-CV-1749-RCF (N.D. Ga.) \*

Georgia v. Reno, C.A. No. 90-2065 (D.D.C. 1995)(three-judge court) \*\*

United States v. State of Arizona, CV 88-1989 PHX EHC (D. Ariz.)\*\*\*

United States v. Socorro County, New Mexico, C.A. No. 93-1244-JP (D. N.M.) \*\*\*

United States v. Brooks County, GA, No. 90-105-Thom (M.D. Ga.)\*

United States v. State of Wisconsin, No. 92C-0263-S (W.D. Wisc.)

United States v. McKinley County, NM, No. 86-0028-M (D. N.M.)\*\*\*

United States v. State of South Carolina, No. 3:90-760-17  
(D. SO. CAR.)(three-judge court) \*\*

United States v. Cibola County, NM, No. CIV93-1134 SC (D. N.M.)\*\*\*

United States v. Lawrence County, MS, (S.D. Miss. 1983)(three-judge court) \*\*

United States v. City of Demopolis, (S.D. Ala. 1986) \*

United States v. Laurens County, SC, C.A. No. 6:87-1817-3 (D.S.C. 1987) \*

United States v. City of Spartanburg, SC, (D.S.C. 1987)\*

United States v. Town of Zebulon, GA, (N.D. Ga.) \*, \*\*

United States v. Wilkes County Board of Ed., (S.D. Ga.)

United States v. County Council of Sumter County, SC, (D.S.C.)(three-judge court) \*\*

United States v. Town of Indian Head, MD, (D. Md.) \*

United States v. City of Laurel, MS, (S.D. Miss. 1981) \*

United States v. County Council of Colleton County, SC, No. 78-903 (D.S.C. 1981)(three-judge court) \*\*

United States v. City of Houston, TX, No. 91-3076 (S.D. Tex.)(three-judge court)\*\*

United States v. Victoria ISD, TX, C.A. No. V-86-17 (S.D. Tex. 1986)(three-judge court) \*\*

United States v. City of Barnwell, SC, No. 1:84-2508-6 (D.S.C. 1986) \*\*

Medina County, TX v. United States, (D.D.C.) (three-judge court) \*\*

Gregg County, TX v. United States, (D.D.C.) (three-judge court) \*\*

United States v. Jones, 846 F. Supp. 955 (S.D. Ala. 1994) \*

United States v. City of Augusta, GA, (S.D. Ga.) \*

United States v. Wicomico County, MD, No. MJG-87-2557 (D. Md. 1991) \*

United States v. East Baton Rouge Parish School Board, LA, C.A. No. 76-252 (M.D. La.) \*

## **2. Cases where Hebert served as lead counsel for the United States in the trial court and the United States appeared as *amicus curiae* in the litigation:**

Blanding v. Dubose, 454 U.S. 393 (1982) (I represented the United States as *amicus curiae* before the three-judge court in this successful lawsuit brought to enforce Section 5 of the Voting Rights Act) \*\*

Lodge v. Buxton, *aff'd sub nom. Rogers v. Lodge*, 458 U.S. 613 (1982) (I represented the United States as *amicus curiae* before the United States Court of Appeals for the Eleventh Circuit in this successful lawsuit brought under the Voting Rights Act and the United States Constitution) \*

Martin v. Mabus, 700 F.Supp. 327 (S.D. Miss. 1988) (three-judge court) (remedy) (I represented the United States as *amicus curiae* before the three-judge court in this successful lawsuit brought to enforce Section 5 of the Voting Rights Act) \*\*

SCLC v. Siegelman, C.A. No. 88-D-462-N (M.D. Ala.) (I represented the United States which filed a brief as *amicus curiae* in this lawsuit brought by private plaintiffs to enforce Section 5 of the Voting Rights Act) \*\*

Clark v. Roemer, C.A. No. 86-435 (M.D. La.) (three-judge court) (I represented the United States which filed a brief as *amicus curiae* in this lawsuit brought by private plaintiffs to enforce Section 5 of the Voting Rights Act) \*\*

Lopez v. Monterey County, California, No. C-91-20559-RMW (EAI) (N.D. Cal.) (three-judge court) (I represented the United States which filed a brief as *amicus curiae* in this lawsuit brought by private plaintiffs to enforce Section 5 of the Voting Rights Act) \*\*

## **Part II**

### **Voting Rights and Election Cases In Which J. Gerald Hebert Has Served As Legal Counsel As a Solo Practitioner (1994 to the Present)**

Listed below are cases in which I have appeared as legal counsel in my solo law practice, 1994 to the present. Cases marked with an asterisk \* are cases involving Section 2 of the Voting Rights Act, those marked with a double asterisk \*\* are Section 4 or 5 Voting Rights Act cases, and those marked with a triple asterisk \*\*\* are language minority cases under the Voting Rights Act (Section 203 cases). Cases in **bold** are cases where I served as lead counsel for the party I represented:

#### **1994 to 2000:**

**UNITED STATES DEPARTMENT OF COMMERCE V. UNITED STATES HOUSE OF REPRESENTATIVES**, 525 U.S. 316 (1999) (In this lawsuit, I represented six Members of Congress who intervened in the case and supported the Census Bureau's methodology for conducting the 2000 census).

**CITY OF ANDREWS, TX V. RENO**, No. 1:95CV01477 (D.D.C. 1996)(three-judge court) (I represented the City of Andrews, Texas in this lawsuit against the United States Attorney General in which the City obtained a declaratory judgment that changes adopted by the City were entitled to preclearance under Section 5 of the Voting Rights Act)\*\*

**DILLARD v. CITY OF FOLEY, AL**, No. CV 87-T-1213-N (M.D. Ala.)(I represented private plaintiffs in this successful challenge under Section 2 of the Voting Rights Act and Constitution to the City of Foley's racially selective annexation policy) \*

**FOREMAN v. COMMISSIONERS' COURT OF DALLAS COUNTY, TX** (N.D. TX) (3-judge court) (I represented private plaintiffs in a suit which established that the changes in the discretionary method of selecting polling officials was a covered change under Section 5 of the Voting Rights Act)\*\*

**PEGRAM and UNITED STATES v. CITY OF NEWPORT NEWS, VA**, No. 4:940000-79 (E.D. Va.) (I represented private plaintiffs in this successful suit challenging the City's at-large method of election under Section 2 of the Voting Rights Act) \*

**HENDERSON V. CITY OF ONEONTA, AL**, No. 98-AR-2491-M (M.D. AL, 1998). In this case, I represented plaintiffs who successfully brought suit to enforce Section 5 of the Voting

Rights Act)\*\*

**SIMPSON V. CITY OF HAMPTON, VA**, No. 4:95cv83 (E.D. Va.)(I represented private plaintiffs in this suit challenging the City's at-large method of election under Section 2 of the Voting Rights Act) \*

**SOUTH CAROLINA CONFERENCE OF BRANCHES OF THE NAACP v. TOWN OF HEMINGWAY, SC**, No. 4:93-2733-21 (D.S.C.) (I represented plaintiffs in this lawsuit brought under the Constitution and Section 2 of the Voting Rights Act challenging Hemingway's racially selective annexation policy) \*

**RICHMOND CRUSADE FOR VOTERS v. COMMONWEALTH OF VIRGINIA**, No. 3:95cv531 (E.D. Va.) (I represented plaintiffs who successfully challenged the Commonwealth of Virginia's refusal to implement the provisions of the National Voter Registration Act)

**MOON v. MEADOWS**, 952 F. Supp. 1941(E.D. Va. 1997)(three-judge court)(I represented a group of voters who intervened as defendants in this lawsuit challenging, on racial gerrymandering grounds, congressional redistricting in Virginia)

**KING v. STATE BD OF ELECTIONS**, No. 95-C-827(N.D. Ill. 1995)(three-judge court) (I filed a brief *amicus curiae* before the three-judge court in 1996 on behalf of the Democratic National Committee and the Democratic Congressional Campaign Committee in this lawsuit challenging congressional redistricting in Illinois)

**VERA v. BUSH**, 116 S. Ct. 1941 (1996)(I appeared as counsel for three incumbent members of Congress whose districts were challenged or affected by this lawsuit challenging congressional redistricting in Texas. One of the three members was granted amicus status)

**ABRAMS v. JOHNSON** (I filed a brief *amicus curiae* in the Supreme Court of the United States on behalf of the Georgia Association of Black Elected Officials in this lawsuit challenging congressional redistricting in Georgia)

**CITY OF FAIRFAX v. RENO**, C.A. No. 97-2212-JR (D.D.C. 1997)(three-judge court)(I represented the City of Fairfax, Virginia, in this first post-1982 suit brought to obtain a declaratory judgment and bailout from coverage under the special provisions of the Voting Rights Act. The bailout judgment was granted to the City in October 1997).\*\*

**SHENANDOAH COUNTY v. RENO**, C.A. No. 99-00992-PLF (D.D.C. 1999)(three-judge court)(I represented Shenandoah County, Virginia, in this suit brought to obtain a declaratory judgment and bailout from coverage under the special provisions of the Voting Rights Act. The bailout judgment was granted to the County in 1999).\*\*

**FREDERICK COUNTY v. RENO**, C.A. No. 99-00941-CKK (D.D.C. 1999)(three-judge court)(I

represented Frederick County, Virginia, in this suit brought to obtain a declaratory judgment and bailout from coverage under the special provisions of the Voting Rights Act. The bailout judgment was granted to the County in 1999.)\*\*

**JENKINS v. CITY OF OZARK, ALABAMA**, No. CV97-A-1450-S (M.D. Ala. 1997)(three-judge court)(I represent the plaintiffs in this successful Section 5 enforcement action)\*\*

**LULAC v. CITY OF AUSTIN, TEXAS**, No. A97 CA 908SS(W.D. Tex. 1998)(three-judge court)(I represented the City of Austin, Texas in this Section 5 enforcement action).\*\*

**BAKER v. RAINBOW CITY, AL.**, No. 97-PT-3014 (N.D. Ala. 1997)(three-judge court)(I represented plaintiffs who successfully brought suit to enforce Section 5 of the Voting Rights Act)\*\*

**WILSON V. CITY OF ATTALLA, AL.**, No.97-AR-3195 (N.D. Ala. 1997)(three-judge court)(I represented plaintiffs who successfully brought suit to enforce Section 5 of the Voting Rights Act)\*\*

**HAYS V. LOUISIANA**, 839 F. Supp. 1138 (W.D. La. 1994)(three-judge court)(I represented individual voters and members of the Louisiana Legislature who participated as *amicus curiae* in this lawsuit challenging congressional redistricting in Louisiana)

**JOHNSON V. MORTHAM**, No. CV-94-40025 (N.D. Fla.)(three-judge court) (I represented Congresswoman Corrine Brown as a defendant-intervenor in this lawsuit brought challenging congressional redistricting in Florida)

**HUNT V. CROMARTIE**, (U.S. Supreme Court) (I represented several members of the Congressional Black Caucus and filed a brief as *amicus curiae* in this lawsuit challenging congressional districts in North Carolina)

**BOXX V. STATE OF ALABAMA**, M.D. Ala. (3-judge court)(I represented plaintiffs who successfully brought suit to enforce Section 5 of the Voting Rights Act)\*\*

**WARD V. STATE OF ALABAMA**, M.D. Ala. (3-judge court)(I represented plaintiffs who successfully brought suit to enforce Section 5 of the Voting Rights Act)\*\*

**COMMONWEALTH OF VIRGINIA V. RENO**, No. 1:00 CV 00751 (D.D.C.)(3-judge court) (I represented defendant intervenors, a group of state legislators, in this lawsuit which challenged, *inter alia*, the Department of Justice's plan to use statistically-sampled census data to review redistricting plans under the Voting Rights Act).\*\*

**VOTING INTEGRITY PROJECT v. ARIZONA DEMOCRATIC PARTY**, I represented the Arizona Democratic Party in a suit brought under the Voting Rights Act challenging the State Party's use of internet voting in the 2000 Presidential Primary. Plaintiffs sought a preliminary

injunction against the Party's use of internet voting, but the district court denied the requested injunction.\*

**2001 to 2010:**

**BALDERAS V. STATE OF TEXAS**, (E.D. TX 2001) (3-judge court)(consolidated), *summarily affirmed*, 536 U.S. 919 (2002). This suit involved a successful challenge to the failure of the Texas Legislature to redistrict its Texas congressional districts. I represented a group of Congressmen who intervened in the case. \*

**SESSIONS V. STATE OF TEXAS**, (E.D. TX 2003)(3-judge court)(consolidated). This suit challenged the 2003 re-redistricting of the Texas congressional districts. The case eventually went to the U.S. Supreme Court *sub nom. LULAC v. Perry*.\*

**JACKSON v. STATE OF TEXAS**, (E.D. TX 2003)(3-judge court)(consolidated). This suit challenged the 2003 re-redistricting of the Texas congressional districts. The case eventually went to the U.S. Supreme Court *sub nom. LULAC v. Perry*.\*

**DEL RIO v. STATE OF TEXAS** (Travis County District Court & Texas Supreme Court) This suit involved the redistricting of the Texas congressional districts. I represented a group of Congressmen who intervened in the case.\*

**CITY OF HARRISONBURG, VA v. ASHCROFT**, No. 02-00289-JDB (D.D.C) (I represented the City of Harrisonburg, Virginia, in this suit brought to obtain a declaratory judgment and bailout from coverage under the special provisions of the Voting Rights Act. The bailout judgment was granted to the City in 2002).\*\*

**CITY OF WINCHESTER, VA v. RENO**, No. 00-03073-ESH (D.D.C) (I represented the City of Winchester, Virginia, in this suit brought to obtain a declaratory judgment and bailout from coverage under the special provisions of the Voting Rights Act. The bailout judgment was granted to the City in 2001).\*\*

**WARREN COUNTY, VA v. RENO**, No. 02-0173-EGS (D.D.C) (I represented Warren County, Virginia, in this suit brought to obtain a declaratory judgment and bailout from coverage under the special provisions of the Voting Rights Act. The bailout judgment was granted to the County in 2002).

**ROCKINGHAM COUNTY, VA v. ASHCROFT**, No. 02-00391-ESH (D.D.C) (I represented Rockingham County, Virginia, in this suit brought to obtain a declaratory judgment and bailout from coverage under the special provisions of the Voting Rights Act. The bailout judgment was granted to the County in 2002).\*\*



**GREENE COUNTY, VA v. ASHCROFT**, No. 03-1877-HHK (D.D.C.). (I represented Greene County, Virginia, in this successful suit brought to obtain a declaratory judgment and bailout from coverage under the special provisions of the Voting Rights Act. The bailout judgment was granted to the County in January 2004).\*\*

**AUGUSTA COUNTY, VA v. GONZALES**, No. 05-1885 (D.D.C.) (three-judge court). In this action, I represented Augusta County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**NAACP v. ST. LANDRY PARISH, LOUISIANA**, I represented the defendants St. Landry Parish Council and School Board in this Voting Rights Act challenge to the 2002 redistricting plans adopted by the Council and School Board. The case was settled in January 2005.\*

**HALL v. COMMONWEALTH OF VIRGINIA**, 276 F. Supp. 2d 528 (E.D. Va. 2003), *affirmed*, 385 F.3d 421 (4<sup>th</sup> Cir. 2004), *cert. denied* (2005). I served as co-counsel representing plaintiffs in an unsuccessful Voting Rights Act challenge to the post-2000 congressional redistricting plan adopted by the Commonwealth of Virginia.

**MAY v. CITY OF MONTGOMERY, ALABAMA**, No. 2:07cv738 (M.D.Ala.)(three-judge court). This suit alleged, among other things, that the City had failed to obtain the requisite preclearance of a new election schedule from federal authorities. Plaintiffs sought to enjoin the upcoming elections, citing the alleged lack of preclearance under the Voting Rights Act. I was co-counsel to the City of Montgomery, which contended that preclearance had been obtained. The case was dismissed as moot. \*\*

**CITY OF SALEM, VA v. GONZALES**, No.06-977 (DDC) (three-judge court). In this action, I represented the City of Salem in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**BOTETOURT COUNTY, VA v. GONZALES**, No. 06-1052(D.D.C) (three-judge court). In this action, I represented Botetourt County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**ESSEX COUNTY, VA v. MUKASEY**, (D.D.C) (three-judge court). In this action, I represented Essex County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**AMHERST COUNTY, VA v. MUKASEY**, (D.D.C) (three-judge court). In this action, I represented Amherst County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**MIDDLESEX COUNTY, VA v. MUKASEY**, (D.D.C) (three-judge court). In this action, I represented Middlesex County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*



**PAGE COUNTY, VA v. MUKASEY**, (D.D.C) (three-judge court). In this action, I represented Page County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**CITY OF KINGS MOUNTAIN v. HOLDER**, 1:10-cv-01153-PLF -DST –TFH (D.D.C.) (three-judge court). In this action, I represented the City of Kings Mountain in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**WILLIE RAY v. STATE OF TEXAS**, 2:06-CV-385(TJW) (E.D. Texas). This case challenged the constitutionality of certain provisions of the Texas Election Code, and the racially selective prosecution of African American and Latino citizens by Texas Attorney General Greg Abbott for allegedly violating those provisions. The case was settled.

**NAMUDNO v. HOLDER**, 557 U.S. 193 (2009). This case challenged the constitutionality of Section 5 of the Voting Rights Act. In the district court, I represented Travis County, Texas, which supported the defendant Holder and argued in favor of the constitutionality of Section 5 of the Voting Rights Act. In the U.S. Supreme Court, I represented jurisdictions that had bailed out from Section 5 coverage and urged the Court to uphold Section 5.

**2011 to Present:**

**PEREZ v. PERRY**, No. 11-360 (W.D. TX)(three-judge court)(consolidated cases--including *Quesada v. Perry*, No. 11-593-OLG-JES-XR) challenging Texas Congressional and State House districts under Sections 2 and 5 of the Voting Rights Act, and the Fourteenth and Fifteenth Amendments to the United States Constitution. The case remains pending.

**DAVIS v. PERRY**, No. 11-788 (W.D. TX)(three-judge court)(consolidated with *LULAC v. Perry*), No. 11-788, challenging under Section 2 and the United States Constitution the state senate redistricting plan insofar as it dismantled Senate District 10 and in doing so discriminated against minority voters in the district.

**BEAUMONT INDEPENDENT SCHOOL DISTRICT v. UNITED STATES OF AMERICA**, 1:13-cv-00401-RC-BMK-ESH (D.D.C.) (three-judge court) (In this Section 5 declaratory judgment case, I represented the Plaintiff Beaumont ISD seeking Voting Rights Act approval of certain voting changes)

**STATE OF TEXAS v. UNITED STATES OF AMERICA** 1:11-cv-01303-RMC-TBG-BAH (D.D.C.) (three-judge court) (In this lawsuit, the State of Texas sought preclearance to its statewide redistricting plans. I represented a group of Defendant Intervenors who successfully opposed preclearance of the state senate plan and the congressional plan before the three-judge

court. I also served in the case as co-administrative coordinator for the various Defendant-Intervenor groups in the lawsuit. The Supreme Court vacated and remanded the case following the decision in *Shelby County, Al. v. Holder*).

**STATE OF TEXAS v. HOLDER**, 1:12-cv-00128-RMC-DST-RLW (TX Voter ID case). In this lawsuit, the State of Texas sought Section 5 preclearance of its photo ID bill. I represented a group of Defendant Intervenor groups who opposed preclearance. I also served as co-administrative coordinator for the various Defendant-Intervenor groups. The three-judge court denied preclearance. On appeal, the decision was vacated and the case remanded to the D.C. Court in light of *Shelby County, AL v. Holder*.

**LAROQUE et al v. HOLDER**, 1:10-cv-00561-JDB (D.D.C.) This case challenged the constitutionality of the Voting Rights Act and I represented a group of Defendant-Intervenor groups defending against the challenge. On appeal, the case was declared moot.

**STATE OF SOUTH CAROLINA v. UNITED STATES OF AMERICA**, No. 1:12-cv-00203 (CKK-BMK-JDB) (D.D.C.) (three-judge court). I served as co-counsel to a group of Defendant-Intervenor groups in this Section 5 declaratory judgment suit involving the South Carolina voter ID law. The State was granted preclearance after changes were made during the litigation to the photo ID bill.\*\*

**LEAGUE OF WOMEN VOTERS v. DETZNER**, No.: 2012-CA-00490 (Leon County, Florida). I am co-counsel to the League of Women Voters which challenges the redistricting of Florida's state senate and congressional redistricting plans, on the grounds that those plans violate the State Constitution's prohibitions on drawing plans to favor one political party over another or to favor an incumbent. The case is pending.

**BROWN v. STATE OF FLORIDA** (S.D. Florida). This case was a challenge to the constitutionality of amendments to the Florida Constitution that regulated statewide redistricting plans. I represented a group of intervenor defendants who supported the provisions. The district court upheld the amendments and the U.S. Court of Appeals affirmed.

**YUBA COUNTY WATER AGENCY v. HOLDER**, No. 1:13-cv-00352 (D.D.C.) (three-judge court). In this action, I represented the Water Agency in an action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. The case was dismissed without prejudice following the Supreme Court's ruling in *Shelby County, Alabama v. Holder*. \*\*

**NORTH YUBA WATER DISTRICT v. HOLDER**, 1:13-cv-00407 (D.D.C.) (three-judge court). In this action, I represented the Water District in an action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. The case was

dismissed without prejudice following the Supreme Court's ruling in *Shelby County, Alabama v. Holder*. \*\*

**LINDA FIRE PROTECTION DISTRICT v. HOLDER**, 1:13-cv-00485 (D.D.C.). In this action, I represented the Fire Protection District in an action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. The case was dismissed without prejudice following the Supreme Court's ruling in *Shelby County, Alabama v. Holder*. \*\*

**LINDA COUNTY WATER DISTRICT v. HOLDER**, 1:13-cv-00363-JEB-JWR-JDB). In this action, I represented the Water District an action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. The case was dismissed without prejudice following the Supreme Court's ruling in *Shelby County, Alabama v. Holder*. \*\*

**HANOVER COUNTY, VIRGINIA v. HOLDER**, 1:13-cv-00625-BAH-JRB-KBJ). In this action, I represented Hanover County in an action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. The case was dismissed without prejudice following the Supreme Court's ruling in *Shelby County, Alabama v. Holder*. \*\*

**CITY OF FALLS CHURCH, VIRGINIA v. HOLDER**, 1:13-cv-00201-ABJ-DBS-RJL). In this action, I represented the City of Falls Church in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**CITY OF WHEATLAND, CALIFORNIA v. HOLDER**, 1:13-cv-00054-RMC-DST-RBW). In this action, I represented the City of Wheatland in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**STATE OF NEW HAMPSHIRE v. HOLDER**, 1:12-cv-01854-EGS-TBG-RMC). In this action, I represented the State of New Hampshire in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**BROWNS VALLEY IRRIGATION DISTRICT v. HOLDER**, 1:12-cv-01597-RWR-KLH-TFH). In this action, I represented Browns Valley Irrigation District in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**MERCED COUNTY, CALIFORNIA v. HOLDER**, 1:12-cv-00354-TFH-DST-ABJ). In this action, I represented Merced County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**PRINCE WILLIAM COUNTY, VIRGINIA v. HOLDER**, 1:12-cv-00014-ESH-TBG-JEB). In this action, I represented Prince William County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**KING GEORGE COUNTY, VIRGINIA v. HOLDER**, 1:11-cv-02164-BAH-KLH-ESH). In this action, I represented King George County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**JAMES CITY COUNTY, VIRGINIA v. HOLDER**, 1:11-cv-01425-PLF-DST-TFH). In this action, I represented James City County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**CITY OF WILLIAMSBURG, VIRGINIA v. HOLDER**, 1:11-cv-01415-EGS-JR-RWR (D.D.C.) (three-judge court). In this action, I represented Williamsburg in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**CULPEPER COUNTY, VIRGINIA v. HOLDER**, 1: 1:11-cv-01477-JEB-JWR-RLW (D.D.C.) (three-judge court). In this action, I represented Culpeper County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**CITY OF BEDFORD, VIRGINIA v. HOLDER**, 11-cv-00473-TFH-TBG-RLW (D.D.C.) (three-judge court). In this action, I represented the City of Bedford in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**BEDFORD COUNTY, VIRGINIA v. HOLDER**, 1:11-cv-00499-ESH-KLH-BAH (D.D.C.) (three-judge court). I represented Bedford County in a successful bailout action brought under Section 4 of the Voting Rights Act. \*\*

**RAPPAHANNOCK COUNTY, VIRGINIA v. HOLDER**, 1:11-cv-01123-JEB -KLH-RMC (D.D.C.) (three-judge court). I represented Rappahannock County in a successful bailout action brought under Section 4 of the Voting Rights Act. \*\*

**CITY OF MANASSAS PARK, VIRGINIA v. HOLDER**, 1:11-cv-00749-CKK-JRB-HHK (D.D.C.) (three-judge court). I represented the City of Manassas Park in a successful bailout action brought under Section 4 of the Voting Rights Act. \*\*

**ALTA IRRIGATION DISTRICT v. HOLDER**, 1:11-cv-00758-RJL-DAG-PLF (D.D.C.) (three-judge court). I represented the Alta Irrigation District in a successful bailout action brought under Section 4 of the Voting Rights Act. \*\*

**JEFFERSON COUNTY DRAINAGE DISTRICT NO. 7 v. HOLDER**, 1:11-cv-00461-RWR-DST-RJL) (D.D.C.) (three-judge court). I represented this Jefferson County Drainage District in a successful bailout action brought under Section 4 of the Voting Rights Act.\*\*

**HANOVER COUNTY, VIRGINIA v. HOLDER** (D.D.C.) (three-judge court). In this lawsuit, I represented Hanover County in a successful action brought under Section 4 of the Voting Rights Act to obtain a bailout from the special remedial provisions of the Act. \*\*

**HARDING v. DALLAS COUNTY, TEXAS**, No. 3:15-CV-00131-D (N.D. TX). This is a pending challenge by Anglo voters to the 2011 redistricting plan for the Dallas County Commissioners' Court. I serve as co-counsel to the defendants in the case, which is currently on appeal to the Fifth Circuit.

### **PART III**

#### **Cases In Which J. Gerald Hebert Has Served As Legal Counsel To A Party or An Amicus Curiae on Behalf of the Campaign Legal Center**

##### **(2004 to the present)**

Listed below are cases in which I have appeared as legal counsel for a party or for an *amicus curiae* in campaign finance cases, Voting Rights Act cases, or other election law cases at the Campaign Legal Center, a non-profit, non-partisan organization in Washington, DC.

##### **Federal Litigation**

***CITIZENS UNITED v. FEC*** (U.S. Supreme Court.) Citizens United filed suit to challenge the federal "electioneering communications" corporate funding restriction and disclosure requirements as applied to its film entitled *Hillary: The Movie* and its advertisements promoting the film. On July 18, 2008, a three-judge panel upheld the federal law. On January 21, 2010, the Supreme Court struck down the 60-year-old federal restriction on corporate expenditures in candidate elections, and overturned *Austin v. Michigan Chamber of Commerce* (1990) and part of *McConnell v. FEC* (2003). In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed one *amici* brief with the district court and two *amici* briefs with the Supreme Court on behalf of campaign finance reform groups.

***WISCONSIN RIGHT TO LIFE v. FEC***, (US Supreme Court) and No. 04-1260 (DBS, RWR, RJJ)(D.D.C.)(3-judge court). Wisconsin Right to Life (WRTL) challenged provisions of BCRA which prohibited it from making certain election communications during and prior to the 2004 elections. The three-judge court rejected WRTL's challenge and the Supreme Court reversed and struck down the provisions. I served as legal counsel for the Campaign Legal Center, Senator John McCain, and Representatives Christopher Shays and Martin Meehan in the case as *amici curiae* supporting the defendant FEC.

***MCCOMISH v. BENNETT*, No. 10-686 (U.S. Supreme Court).** This was a constitutional challenge to the “matching funds trigger provisions” of the Arizona Citizens Clean Elections Act, which provided participating candidates with additional funds if non-participating opponents or outside groups spend above the statutory threshold. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amici* brief in the Supreme Court on behalf of the Legal Center and seven other public interest groups to defend the Arizona law. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I also filed an *amici* brief with the district court in 2009.

***MCCUTCHEON v. FEC*, 572 U.S. 185 (2014)** This challenge to federal aggregate contribution limits was filed by plaintiffs Shaun McCutcheon and the Republican National Committee (RNC). Plaintiffs in *McCutcheon v. FEC* challenge both the \$70,800 aggregate limit on contributions to non-candidate committees and the \$46,200 aggregate limit on contributions to candidate committees in a two-year election cycle. The three-judge district court rejected the challenge, but the U.S. Supreme Court has noted probable jurisdiction. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amici* brief in the district court and the Supreme Court defending the aggregate limits.

***SHELBY COUNTY v. HOLDER* (U.S. Supreme Court), 570 U.S. 529 (2013).** This case involved a challenge to the constitutionality of certain special provisions of the Voting Rights Act of 1965, as amended. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amici* brief in the Supreme Court on behalf jurisdictions that have bailed out from coverage under the Act.

***EVENWEL V. ABBOTT*, 578 U.S. \_\_ (2016) (U.S. Supreme Court).** This case involved a challenge under the U.S. Constitution to the Census Bureau’s method of conducting the census. The challengers urged the Court to require that the Census Bureau use citizenship voting age population or registered voter data. In my capacity as Director of Litigation for CLC, I represented former Directors of the Census Bureau who filed an *amici curiae* brief in the Supreme Court, urging the Court to reject the plaintiffs’ challenge.

***DAVIS V. FEC*, 554 U.S. 724 (2008) (Supreme Court).** This was a federal court challenge to the Millionaire’s Amendment of the Bipartisan Campaign Reform Act of 2002. Under the Millionaire’s Amendment, when a wealthy self-financed candidate spent in excess of a specified threshold of personal funds, the Amendment provided for an increase in contribution limits and an elimination of coordinated party spending limits for such candidate’s non-wealthy opponent. The Amendment also imposed additional disclosure requirements on the self-financing wealthy candidate. The Supreme Court invalidated all of these provisions. I served as legal counsel to *amici* supporting these amendments in the U.S. Supreme Court.

***COOPER (MCCRORY) V. HARRIS*, NO. 581 U.S. \_\_ (2017) (U.S. SUPREME COURT).** This case involved a challenge to North Carolina’s congressional districts, alleging that they were racially gerrymandered in violation of the U.S. Constitution. The three-judge court found that the State of NC had used race as the predominant factor in drawing district lines without a compelling



reason for doing so. The Supreme Court affirmed. CLC submitted an *amici curiae* brief in the U.S. Supreme Court on behalf of itself, the League of Women Voters, the Voting Rights Institute, the Racial Justice Project at New York Law School, the National Council of Jewish Women and the National Association of Social Workers supporting the challengers (appellees).

**SHAYS v. FEC**, No. 04-5352 (D.C.Cir.) (Shays I). This is an appeal from a ruling of this court (Kollar-Kotelly, J.) striking down regulations promulgated by the FEC to implement the Bipartisan Campaign Reform Act (BCRA). I served as legal counsel to United Senators John McCain and Russell Feingold who appeared in the case as *amici curiae* and filed a brief supporting Appellees Shays and Meehan.

**SHAYS v. FEC (527 Suit)**, No. 1:04-cv-01597-EGS (D.D.C.) (Sullivan, J.) (Shays II). This lawsuit challenge the failure of the FEC to promulgate effective regulations that would apply to 527 groups. I served as legal counsel to United Senators John McCain and Russell Feingold who appeared in the case as *amici curiae*.

**LAIR V. MOTL**, 873 F. 3d 1170 (9<sup>th</sup> Cir. 2017). This case involved a First Amendment challenge to Montana’s contribution limits. In this case, I filed a brief in the Ninth Circuit Court of Appeals on behalf of the Campaign Legal Center, Common Cause, Justice at Stake and the League of Women Voters on behalf of Montana arguing that the limits were justified by a compelling state interest and that such limits were especially important in judicial elections.

**NC RIGHT TO LIFE v. LEAKE**, No. 5:99-CV-798-BO(3). This case involves a constitutional challenge to several North Carolina campaign finance laws. I represent the Campaign Legal Center in the case, which filed a brief as *amicus curiae* arguing that North Carolina’s limits on contributions to independent expenditure political committees are constitutional.

**VOTERS EDUCATION COMMITTEE v. WASHINGTON PUBLIC DISCLOSURE COMMISSION**, No. 04-2-23551-1SEA (King County Superior Court). Suit alleges that certain ads aimed at a state Attorney General candidate are not express advocacy, but rather are “issue advocacy” and protected “political speech”. I represent the Campaign Legal Center in the case, which filed a brief as *amicus curiae* arguing that the state law at issue does not violate the free speech rights of plaintiff 527 corporations by requiring them to register as a political organization and file reports of their contributions and expenditures.

**EMILY’S LIST v. FEC**, No. 1:05cv00049 (D.D.C.). EMILY’s List challenged a new rule adopted by the FEC late last summer that requires a federal committee to use at least 50 percent federal funds to pay for generic voter mobilization drives and other activities that affect both federal and nonfederal elections, along with a rule that clarified the definition of the term “contribution.” I represented Senators John McCain and Russell Feingold, Representatives Christopher Shays and Martin Meehan, and the Campaign Legal Center which appeared as *amici curiae* in the case and filed a brief opposing EMILY’s List’s motion for a preliminary injunction.

***CHRISTIAN CIVIC LEAGUE OF MAINE v. FEC*, No. CV06-0614 (three-judge court)** (D.D.C.). The Christian Civic League of Maine has challenged provisions of BCRA which prohibited it from making certain election communications during and prior to the 2006 elections in Maine. The three-judge court denied the Christian Civic League's motion for preliminary injunction and the case is on appeal to the U.S. Supreme Court. I served as co-counsel for the defendant intervenors in the case: U.S. Senators John McCain and Russ Feingold, and Representatives Christopher Shays, Martin Meehan, and Tom Allen supporting the defendant FEC.

***DELAWARE STRONG FAMILIES V. DENN*, 793 F. 3d 304 (2015)(3rd Cir.)**. This case was a constitutional challenge to the State of Delaware's electioneering communications disclosure requirements. CLC was co-counsel to the State of Delaware in the case and defended the law. The United States Court of Appeals for the Third Circuit held that the law's disclosure requirements were sufficiently tailored to Delaware's asserted interest in an "informed electorate."

***UNITED STATES v. VALDES***, No. 03-3066 (DC Cir.) I filed an *amicus* brief in the U.S. Court of Appeals for the District of Columbia on behalf of the Campaign Legal Center supporting the defendant United States in this appeal, which involved an interpretation and application of the federal anti-gratuities statute.

***CAO(RNC) v. FEC*, No. 10-30146 (5th Cir.), cert. denied No. 10-776 (U.S. Sup. Ct.)** In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amicus* brief on April 19, 2010 with the *en banc* Fifth Circuit Court of Appeals to defend the constitutionality of the party coordinated spending limits.

***GREEN PARTY OF CONNECTICUT V. LENGE*, Nos. 09-0599, 09-0609 (2d Cir.), cert. petition No. 10-795 (U.S. Sup. Ct.)** In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, , I served as co-counsel to the defendant-intervenors in the Supreme Court opposing the petition for *certiorari*, a case that challenged the constitutionality of Connecticut's public financing system and its statutory ban on contributions from lobbyists, state contractors and members of their immediate families and their solicitation of contributions.

***U.S. v. O'DONNELL*, No. 09-50296 (9th Cir.), cert. petition No. 10-1099 (U.S. Sup. Ct.)** This case involved whether federal law "prohibits straw donor contributions, in which a defendant solicits others to donate to a candidate for federal office in their own names and furnishes the money for the gift either through an advance or a prearranged reimbursement. CLC, with D21, filed an *amici* brief with the Ninth Circuit, urging the Court to correct the erroneous interpretation given to the federal law provision by the district court.

***U.S. v. DANIELCZYK*, No. 11-cr-00085 (E.D. Va.), No. 11-4667 (4th Cir.)** This criminal case concerned a number of alleged campaign finance violations, including that the defendants illegally directed corporate contributions to Hillary Clinton's 2008 Presidential campaign. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amici* brief in the U.S. Court of Appeals for the Fourth Circuit on the side of the United States.



**KOERBER v. FEC, No. 2:08-cv-00039 (E.D.N.C.)** In September 2008, the Committee for Truth in Politics challenged the constitutionality of the federal disclosure requirements for “electioneering communications,” and the FEC’s policy for determining federal “political committee” status. The CLC, with D21, filed *amici* briefs defending the law on October 14, 2008 with the district court, and on April 24, 2009 with the Fourth Circuit.

**THE REAL TRUTH ABOUT OBAMA, INC. (RTAO) v. FEC, No. 08-cv-00483 (E.D. Va.), No. 11-1760 (4th Cir.)** RTAO filed suit in the U.S. District Court for the Eastern District of Virginia to enjoin a number of FEC regulations governing when independent groups must register as federal political committees and comply with the applicable federal restrictions and disclosure requirements. The CLC, with D21, filed an *amici* brief on October 27, 2011 to defend the FEC rules with the Fourth Circuit following the remand of the case from the Supreme Court. The CLC previously filed *amici* briefs in this case in the district court and the Fourth Circuit on August 14, 2008, October 28, 2008 and October 17, 2010.

**VAN HOLLEN v. FEC, No. 11-cv-00766 (D.D.C.)** On April 21, 2011, Representative Chris Van Hollen (D-MD) filed a lawsuit against the FEC to challenge a 2007 FEC regulation that narrowed the scope of federal disclosure requirements connected to electioneering communications. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center (CLC), I was one of the attorneys representing Rep. Van Hollen as CLC is part of Van Hollen’s *pro bono* legal team. The case remains pending.

**AMERICAN TRADITION PARTNERSHIP, INC. v. BULLOCK, DA 11-0081 (Sup. Ct. Mont.), cert. denied No. 11-1179 (U.S. Sup. Ct.)** In March 2010, plaintiffs filed suit to challenge Montana’s corporate expenditure restriction, M.C.A. § 13-35-227, on grounds that it was unconstitutional under *Citizens United v. FEC*. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amici* brief in support of itself and 13 other public interest groups on May 18, 2012, urging the U.S. Supreme Court to deny *certiorari*, or if it grants *certiorari*, to grant plenary review.

**WAGNER v. FEC, No. 11-cv-1841 (D.D.C.)** On October 19, 2011, plaintiffs filed a complaint with the U.S. District Court for the District of Columbia to challenge the constitutionality of the federal governmental contractor contribution ban, 2 U.S.C. § 441c, as applied to individuals who have personal services contracts with federal agencies. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amicus* brief in the district court supporting the contractor contribution ban.

**RNC v. FEC, No. 1:08-cv-01953-RJL-RMC (D.D.C.) (three-judge court).** On November 13, 2008, the RNC filed suit in federal district court to challenge BCRA’s “soft money” restrictions that bar the national parties from raising or spending soft money and prohibit state parties from using soft money for activities that affect federal elections, such as voter registration or GOTV drives. On March 9, 2009, the Legal Center filed an *amici* brief on behalf of former Representatives Shays and Meehan and Senators McCain and Feingold to defend the “soft money” provisions. On June 29, 2010, the Supreme Court summarily affirmed the decision of a three-judge

panel to dismiss the RNC's as-applied challenge to the soft money restrictions of the Bipartisan Campaign Reform Act (BCRA).

***SPEECHNOW.ORG v. FEC* (D.C. Cir.)** In February 2008, SpeechNow.org filed suit and requested a preliminary injunction to enjoin the federal contribution limits and disclosure requirements as applied to so-called "independent expenditure committees." THE DC Circuit struck down the contribution limits but upheld the disclosure requirements. The Legal Center filed two *amici* briefs with the D.C. Circuit in 2009 to support the constitutionality of the federal contribution limits as applied to a political committee making only independent expenditures.

***HISPANIC LEADERSHIP FUND v. FEC*, No. 1:12cv893** (E.D. VA.). Plaintiffs sought to air television advertisements criticizing President Obama without complying with "electioneering communication" disclosure requirements, which include donor disclosure. The ads proposed by HLF would not have mentioned President Obama by name and instead would use the terms "the White House" and "the Administration" and audio recordings of the President's voice. In an attempt to evade the electioneering communication disclosure requirements, HLF argued that its ads do not refer to a clearly identified candidate, and that the disclosure provisions are unconstitutional. The District Court denied an injunction and rejected the constitutional challenge. In my capacity as Director of Litigation for the non-profit, non-partisan Campaign Legal Center, I filed an *amicus* brief in 2012 supporting the FEC and defending the challenged provisions.

***VAN HOLLEN v. IRS***, No. 13-1276 (D.D.C.) (JDB), this lawsuit was filed on August 23, 2013, and challenged the failure of the IRS to conduct a rulemaking proceeding to adopt new rules to properly implement the tax law's eligibility requirements for tax-exempt status as a 501(c)(4) "social welfare" organization. I served as co-counsel to the plaintiff in my capacity as Director of Litigation for the Campaign Legal Center. The case was recently dismissed voluntarily based on the IRS's announcement that it is undertaking a rulemaking proceeding to address the problems arising from campaign activities by 501(c)(4) groups.

***LEWIS V. STATE OF ALABAMA*, No. 17-11009 (11th Cir.)(2018)**. In this case, a district court in Alabama had held that the Voting Rights Act did not authorize a private right of action or abrogate state sovereign immunity. CLC served as co-counsel to *amici curiae* NAACP Legal Defense and Educational Fund, Inc. and the Campaign Legal Center, submitting a brief in the Eleventh Circuit Court of Appeals urging a reversal of the lower court decision. The brief addressed two issues: sovereign immunity and whether private plaintiffs have standing to sue under Section 2 of the Voting Rights Act. The court of appeals reversed the trial court, finding that: 1) plaintiffs have standing to assert their claims against the attorney general, and the Eleventh Amendment provides no shield; and 2) Congress unequivocally expressed its intent to abrogate the states' Eleventh Amendment immunity through § 2 of the Voting Rights Act.

***VEASEY v. PERRY***, No. 13-139 (NGR) (S.D. TX). This case is a challenge to the Texas photo ID law, S.B. 14, brought under the Voting Rights Act and various provisions of the Constitution.

**WHITFORD v. GILL**, No. 3:15-cv-00421 (W.D. Wis.). This is a pending partisan gerrymandering challenge under the U.S. Constitution to the redistricting plan for the Wisconsin General Assembly. A judgment in favor of plaintiffs was handed down in 2016. The U.S. Supreme Court vacated that ruling and remanded the case for further proceedings. The case remains pending before the three-judge district court.

**HOLLOWAY v. CITY OF VIRGINIA BEACH, VIRGINIA**, 2:18cv69 (E.D. VA). This case is a pending challenge under the Voting Rights Act and the U.S. Constitution to the method of electing the Virginia Beach City Council.

**THOMPSON v. STATE OF ALABAMA**, 2:16-cv-00783-ECM-GMB (M.D. Al). This is a pending challenge under the Voting Rights Act and the U.S. Constitution to felon disenfranchisement laws in the State of Alabama.

**WITTMAN V. PERSONHUBALLAH**, 578 U.S. (2016). In this racial gerrymandering case involving congressional districts in Virginia, the CLC submitted an *amici curiae* brief in the U.S. Supreme Court on behalf of itself, the League of Women Voters, the Voting Rights Institute and the National Council of Jewish Women.

**BETHUNE-HILL v. VA. STATE BD. OF ELECTIONS**, 137 S. Ct. 788 (2017). In this racial gerrymandering challenge to legislative districts (General Assembly) in Virginia, CLC submitted an *amici curiae* brief in the U.S. Supreme Court on behalf of itself, the League of Women Voters, the Voting Rights Institute, the Racial Justice Project at New York Law School, the National Council of Jewish Women, and the National Association of Social Workers.

## STATE/MUNICIPAL LAW LITIGATION

### State Disclosure Cases

**DOE v. REED**, No. 09-559 (U.S. Sup. Ct.), on remand No. 3:09-cv-05456 (W.D. Wa.), on appeal No. 11-35854 (9th Cir.) Plaintiffs filed suit to halt Washington State from making petitions connected to a state ballot measure available in response to requests made under the state Public Records Act. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amicus* brief on March 28, 2012 with the Ninth Circuit, urging the court to reject the plaintiffs' as-applied challenge and arguing that the narrow exemption to disclosure for harassment set forth in *Buckley v. Valeo* was not warranted in this case.

**PROTECTMARRIAGE.COM v. BOWEN**, 2:09-cv-00058 (E.D. Calif.), on appeal No. 11-17884 (9th Cir.) In January 2009, Plaintiffs brought a challenge in the U.S. District Court for the Eastern District of California to a California law requiring ballot measure committees to disclose the names and other information of their contributors of \$100 or more. In my capacity as Director

of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amicus* brief to support California's ballot measure disclosure law with the Ninth Circuit on April 17, 2012.

***HUMAN LIFE OF WASHINGTON, INC. (“HLW”) v. BRUMSICKLE*, No. 09-35128 (9th Cir.)** In April 2008, HLW challenged the constitutionality of several components of the State of Washington's political committee disclosure regime, including the State's definitions of “political committee,” “independent expenditure,” and “political advertising.” On June 4, 2009, and in my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amicus* brief with the Ninth Circuit to defend the disclosure laws.

***OHIO RIGHT TO LIFE (ORTL) v. OHIO ELECTION COMMISSION*, 08-cv-00492 (S.D. Ohio).** ORTL filed suit in the U.S. District Court of the Southern District of Ohio to challenge multiple provisions of Ohio's campaign finance law, including its “electioneering communications” corporate funding prohibition and related disclosure requirements. On July 18, 2008, and in my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center (CLC), I filed an *amici* brief on behalf of CLC and Ohio Citizen Action, defending the constitutionality of Ohio's electioneering communications disclosure requirements.

***TEXAS DEMOCRATIC PARTY v. KING STREET PATRIOTS*, No. D-1-GN-11-002363 (D.Ct. Travis Co.)** The Texas Democratic Party filed an action seeking damages and declaratory and injunctive relief in connection to several violations of state campaign finance law allegedly committed by the King Street Patriots. In response to the suit, the King Street Patriots filed a counterclaim challenging numerous provisions of Texas campaign finance law, including the state corporate contribution restriction, and the disclosure and organizational requirements applicable to political committees and related statutory definitions. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed in September 2011 an *amicus* brief to oppose the counterclaim and to defend the constitutionality of Texas' campaign finance laws.

***NATIONAL ORGANIZATION FOR MARRIAGE v. BROWNING***, This was a constitutional challenge to certain provisions of Florida law relating to electioneering communications and disclosure, alleging that the provisions were overbroad and vague. In my capacity as Director of Litigation at the non-profit, non-partisan Campaign Legal Center, I filed an *amicus* brief in the Eleventh Circuit defending the Florida laws, which were upheld by the court of appeals.

#### **State Contribution Limit Cases**

***COMMITTEE ON JOBS, ET AL. v. HERRERA*, 07-cv-03199 (N.D. Cal.)** In June 2007, two political committees filed a challenge in the U.S. District Court for the Northern District of California to the constitutionality of San Francisco's limit on contributions to political committees that make only independent expenditures in City elections. On August 27, 2007, the CLC filed an *amici* brief on behalf of itself and four other nonprofit political reform organizations supporting the constitutionality of the San Francisco contribution limits.

***MINNESOTA CONCERNED CITIZENS FOR LIFE (MCCL) v. SWANSON*, 10-cv-2938 (D. Minn.), on appeal No. 10-3126 (8th Cir.)** MCCL challenged multiple provisions of Minnesota's

campaign finance law pertaining to the regulation of corporations. On December 22, 2010, the CLC, with D21, filed an *amici* brief to defend Minnesota's disclosure law and its restrictions on corporate contributions.

***THALHEIMER v. CITY OF SAN DIEGO*, No. 10-55322 (9th Cir.)** In December 2009, plaintiffs filed a constitutional challenge to several provisions of San Diego's campaign finance laws. On April 9, 2010, the CLC filed a brief *amici curie* with the Ninth Circuit on behalf of itself and two other public interest groups to support the contribution limit.

#### **State Public Financing Cases**

***WISCONSIN RIGHT TO LIFE v. BRENNAN*, 3:09-cv-00764 (W.D. Wis.), No. 11-1769 (7th Cir.) and *KOSCHNICK v. DOYLE*, 3:09-cv-00767 (W.D. Wis.)**. In December 2009, two cases were filed to challenge the trigger provisions of Wisconsin's recently-enacted public financing program, as well as other program components. The CLC filed an *amici* brief on June 17, 2011.

#### **Ethics/Public Corruption**

***GIL RAMIREZ GROUP v. HOUSTON INDEPENDENT SCHOOL DISTRICT*, CIVIL ACTION 4:10-CV-04872 (S.D. Texas)**. In early 2016, CLC joined in a lawsuit alleging widespread corruption in the awarding of contracts by the Houston Independent School District (HISD). The Legal Center joined the legal team representing a Houston construction contractor, the Gil Ramirez Group, who was locked out of the school district's construction contracts after refusing to participate in the Board of Trustees' widespread "pay-to-play" scheme. Plaintiffs were awarded around \$5,000,000 in damages. On March 15, 2019, the U.S. Court of Appeals for the Fifth Circuit affirmed that judgment.

## **EXHIBIT B**

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
<b><u>2013</u></b>		<b><u>Time</u></b>
6.25.13	Read SCOTUS Shelby County Decision	1.1
6.25.13	Meet w/attorney C. Dunn to review legal strategies for filing suit	1.6
6.25.13	Communications with clients from DC lawsuit re: filing suit in TX to challenge photo ID	1.5
6.25.13	Review & research law on venue in TX federal court	0.3
6.25.13	Confer with C. Dunn re: drafting of complaint	0.5
6.25.13	Discussion with clients re: funding of litigation	0.4
6.25.13	TC w/Chad Dunn re: adding co-counsel (Baron)(0.3) no charge	
6.26.13	Review C.Dunn's draft of complaint & edit same	0.9
6.26.13	Communications with voting rights attorneys re: filed complaint in Corpus Christi (1.4) no charge	
6.26.13	Review memo from Texas Secretary of State re: immediate implementation of Senate Bill 14	0.2
6.26.13	Discuss with C. Dunn re: prep of advisory on TX's immediate implementation of photo ID law (SB 14)	0.2
6.27.13	Review order re: pretrial & scheduling conference	0.1
6.28.13	Communications with client re: why lawsuit is needed to stop discriminatory photo ID law (0.4) no charge	
6.28.13	Research possible additional claims to add to complaint asserting various constitutional violations	1.6
6.27.13	Communications with Armand Derfner re: additional claims to make in amended complaint	0.2
6.28.13	Additional Communications with Armand Derfner re: additional claims in amended complaint	0.2
7.1.13	Communication with Armand Derfner re: adding a 2nd amendment claim in amended complaint for non-gun owners in TX (0.2) no charge	
7.1.13	Draft amended complaint adding new claims	1.8

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
7.2.13	Legal research into DPS services in TX for insertion into amended complaint	0.5
7.3.13	Drafting of amended complaint	1.3
7.8.13	Legal research comparing TX's photo ID law to other states' ID laws for inclusion in amended complaint	2.7
7.10.13	Review C. Dunn's draft of certificate of interested parties (0.2)	no charge
8.8.13	Legal research for claims to be added to amended complaint	0.6
8.14.13	Review edits to amended complaint by C. Dunn (0.9)	no charge
8.14.13	Communications w/Luis Vera of LULAC re: LULAC chapters in TX & LULAC as plaintiff	0.4
8.15.13	Review edits & comments on draft amended complaint by A. Derfner (0.4)	no charge
8.16.13	Review comments on draft amended complaint by C. Dunn (0.1)	no charge
8.16.13	Tele. Communication w/C. Dunn re: new clients in amended complaint (0.3)	no charge
8.16.13	Review caselaw on standing of our plaintiffs	0.5
8.17.13	Review edits to amend. complaint by A. Derfner (0.3)	no charge
8.20.13	Communications with C. Dunn re: adding & standing of new plaintiffs in amended complaint	0.3
8.20.13	Communication w/C. Dunn re: Dallas County as plaintiff (0.2)	no charge
8.20.13	Communication w/C. Dunn re: hiring of expert witnesses	0.3
8.21.13	Made edits to near final draft of amended complaint	2.1
8.21.13	Review comments on draft amended complaint by A. Derfner (0.2)	no charge
8.22.13	Communication with client re: filing of amended complaint	0.1
8.22.13	Review complaint (U.S. v. TX) from DOJ atty Bell-Platts	0.2



<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
8.22.13	Review communications to clients re: filing of amended complaint (0.3)	no charge
8.23.13	Communications with client re: amended complaint and retainer	0.2
8.23.13	Communication from TX AG office (P. Sweeten)	
	re: name of TX AG atty handling voter ID lawsuit	0.1
8.23.13	Draft of pro hac vice motion for Hebert	0.2
8.26.13	Review filed pro hac vice motion for Hebert (0.1)	no charge
8.26.13	Review communication from N. Baron to John Scott in TX AG office re: waiver of service (0.2)	no charge
8.26.13	Review communication of Neil Baron re: representation (0.3)	no charge
8.27.13	Review motion to intervene filed by TX League of Young Voters with attachments (complaint, exhibits)	0.5
8.27.13	Review communications from Neil Baron re:	
	conversations with John Scott re: consolidation of lawsuits and waiver of service (0.2)	no charge
8.27.13	Communications to co-counsel re:	
	transmittal exhibit lists, trial transcripts, and lists of witnesses from DC preclearance case (0.3)	no charge
8.28.13	Review filed waiver of service by Perry & Steen (0.1)	no charge
8.28.13	Review filed Notices of Appearance for Hebert & Derfner (0.1)	no charge
8.29.13	Review order granting pro hac vice motion (0.1)	no charge
8.30.13	Review unopposed motion to consolidate filed by U.S.	0.1
8.30.13	Review order granting motion to consolidate cases	0.1
9.6.13	Review pro hac vice orders for multiple counsel for TX League of Young Voters (0.2)	no charge
9.10.13	Call w/co-counsel & DOJ re: consolidation, scheduling,	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	discovery issues (coordination)	1
9.10.13	Review filed letter from R. Allensworth (0.1)	no charge
9.12.13	Communication from US DOJ attorney (Bell-Platts) case schedule	0.1
9.13.13	Communications w/U.S. DOJ attorneys re: setting up	
	a conference call to discuss scheduling issues (0.1)	no charge
9.13.2013	Call w/ co-counsel re: scheduling, discovery	1
9.16.2013	Call w/ DOJ re: scheduling, discovery	1
9.16.13	Review response of U.S. to motion to intervene	0.3
9.17.13	Review notice of appearance John Scott (0.1)	no charge
9.17.13	Communication from E. Rosenberg for NAACP  advising motion to consolidate and seeking consent	0.1
9.17.13	Call with co-counsel to discuss call w/ DOJ attys  re: discovery schedule and trial date/length issues	1.1
9.17.13	Conference call with DOJ attys to discuss scheduling issues and dates/deadlines	0.9
9.17.13	Prepare & Review chart comparing DOJ proposed schedule to our dates and Court's dates	0.3
9.17.13	Post-DOJ call communications with DOJ (Bell-Platts) re: trial date agreement (of Sept 8)	0.2
9.18.13	Review motion to consolidate filed by MALC & TX NAACP	0.1
9.18.13	Telephone conference with US DOJ, TX AG's office re: Rule 26 disclosures and scheduling	0.5
9.18.13	Review TX's expert witness Dr. Shaw's trial testimony in DC preclearance case to prepare cross- examination	1.5
9.19.13	Review Notice from Court resetting date of initial conference	0.1
9.19.13	Review order granting motion to intervene filed by TX League	0.1

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
9.19.13	Review consent order granting consolidation Communications with co-counsel & counsel for other	0.1
9.19.13	plaintiffs to arrange conference call w/DOJ (0.4)	no charge
9.19.13	Communication from DOJ's Bell Platts confirming call on 9/20 (0.1)	no charge
9.20.13	Review orders granting pro hac vice motions of TX NAACP counsel (0.1)	no charge
9.20.13	Tele conference call with counsel for all plaintiffs' groups, including DOJ	1
9.20.13	Communication from E. Rosenberg re: trial date & other deadlines proposed by plaintiffs	0.2
9.21.13	Review communication from DOJ counsel (Bell- Platts)  regarding Rule 26 conference issues & enclosing  DOJ's proposed draft ESI agreement, Proposed Protective Order, & Proposed Supp. Protective Order	1.3
9.23.13	Review TX SOS communications re: Mobile units providing EICs	0.1
9.23.13	Review filed letter from R. Allensworth (0.1)	no charge
9.23.13	Comm. from co-counsel re: trial schedule (0.2)	no charge
9.24.13	Review article re: 84 year old Lufkin woman who is  unable to get a photo ID after 3 trips to DPS (0.1)	no charge
9.24.13	Tele. Call to clerk re: problems with ECF filing (0.2)	no charge
9.24.13	Review letter from US DOJ atty (Freeman) to TX AG  atty (Scott) re: discovery & legislative privilege	0.2
9.24.13	Review letter from US DOJ atty (Marzano) to TX AG  atty (Scott) re: contacting legislators (with exhibit)	0.3
9.25.13	Discuss DOJ letter w/co-counsel (C. Dunn)(0.2)	no charge

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
9.25.13	Review motion to intervene by True the Vote	0.5
9.25.13	Tele. Conference w/co-counsel (Dunn, Derfner, Baron, Simson) re: division of labor, scheduling, legal strategies for discovery and trial	0.5
9.25.13	Legal research into legality of DPS fingerprinting applicants seeking "free" photo ID	0.2
9.25.13	Legal research on photo ID laws & lower voter turnout	0.7
9.26.13	Begin legal research (0.5) and drafting of memo (1.0)	
	opposing True the Vote's motion to intervene	1.5
9.26.13	Communication with E. Rosenberg re: scheduling a call to discuss schedules (0.2)	no charge
9.26.13	Read email from TX AG atty (Scott) to DOJ (0.1)	no charge
9.26.13	Review attachment A to ESI agreement from DOJ attorney (Bell-Platts) sent to all counsel	0.2
9.27.13	Review news story re: elderly Dallas woman unable to obtain photo ID from DPS (0.1)	no charge
9.27.13	Review motion to intervene by TX Association of Hispanic Judges & Co. Comms.	0.2
9.27.13	Read email from TX AG atty (Scott) to DOJ (0.1)	no charge
	Review analysis of distances from DPS offices to closest maj-minority state house districts as possible trial exhibit	0.2
9.27.13	Review correspondence exchanged between Sen. Ellis and DPS Director (McCraw) re: implementation of SB 14 by DPS	0.2
9.30.13	Review pro hac vice motion by DOJ (0.1)	no charge
10.1.13	Read email from DOJ atty(Bell-Platts) to counsel (0.1)	no charge
10.1.13	Tele. Conference with DOJ attys & other plaintiffs' counsel re: US to file a motion to stay lawsuit	0.3

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
10.1.13	TC with other private plaintiffs groups re: trial schedule and other deadlines	1
10.1.13	Review Motion to Stay filed by U.S.	0.3
10.1.13	Communications from other private plaintiffs as to whether they will oppose DOJ's motion for a stay	0.2
10.1.13	Draft communication to DOJ counsel (Bell-Platts) re:	
	Veasey plaintiffs' position on motion for a stay and review DOJ's reply	0.1
10.2.13	Draft response to U.S. motion for a stay	1.1
10.2.13	Circulate & discuss draft response w/co-counsel (0.3)	no charge
10.2.13	Review draft of litigation hold letter	0.4
10.2.13	Communications with other private plaintiffs' counsel	0.2
10.3.13	Review joint response of NAACP and TX League of Young Voters to U.S. motion for stay	0.2
10.3.13	Review A. Derfner's edits to litigation hold letter	0.1
10.3.13	Review communications from court's case manager re: scheduling a brief hearing (0.1)	no charge
10.3.13	Make final edits to litigation hold letter	0.3
10.3.13	Email litigation hold letter to TX AG & all counsel (0.1)	no charge
10.4.13	Prepare outline for C. Dunn with suggested points to make to court about not delaying trial date and recording names of rejected or provisional voters by State in upcoming elections	0.4
10.4.13	Briefing from co-counsel (C. Dunn) re: results of hearing before Judge Ramos on 10/4 re: Gov. shutdown/stay	0.1
10.4.13	Review Court Notice setting status conference for 10/11/13.	0.1
10.7.13	Review Dr. Barreto expert report from PA voter ID case	0.5

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
10.7.13	Email Barreto & Minnite PA report to co-counsel (0.1)	no charge
10.7.13	Tele. Conference w/co-counsel (Dunn, Derfner, Baron, Simson) re: budget for litigation, hiring of experts & whether to seek a prelim. inj. for upcoming elections	1.5
10.8.13	Review summary of Dr. Lichtman trial testimony from DC preclearance case and highlight areas for his direct examination & possible topics for report/x-exam	0.9
10.8.13	Review order granting U.S. pro hac vice motion (0.1)	no charge
10.8.13	Review potential experts' cost estimates & outline of services to be performed by experts (Baretto, et al.)	0.4
10.8.13	Tele. Conference w/co-counsel (Simson, Dunn, et al.)	
	re: expert cost estimates & expert services needed	0.3
10.8.13	Review & edit litigation hold letter for True the Vote	0.3
10.8.13	Call w/co-counsel re: info rec'd from county election official	
	re: implementation of ID law	0.3
	Call w/ co-counsel (Simson/Dunn) re: funding of experts & experts' cost estimates provided us (incl. scope of reports)	0.4
10.11.13	Prepare for 10/11 hearing before court re: status & Government shutdown	0.2
10.11.13	Participate in Status Hearing before court	0.2
10.17.13	Review filing by U.S. re: appropriation of funds to re-open Government	0.1
10.17.13	Review communication to TX AG atty (Scott) from US DOJ attorney (Marzano) re: contacting legislators	0.2
10.17.13	Read communication from DOJ atty (Westfall) re:	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	revised briefing schedule on TX's motion to dismiss	0.1
10.18.13	Participate in Status Hearing before court re: setting of deadlines for pending motions & State's upcoming motion to dismiss	0.2
10.18.13	Draft email to DOJ attorneys & all plaintiffs' counsel with proposed schedule for further proceedings	0.3
10.18.13	Tele conference call with DOJ & counsel for private plaintiffs' counsel re: new pre-trial deadlines	0.4
10.21.13	Tele. Conference with Veasey co-counsel to discuss division of assignments for discovery, pre-trial schedule dates & trial date to provide court	0.6
10.23.13	Tele. Call with DOJ attys (Baldwin) re: pre-trial and trial dates proposed by U.S. and Veasey plaintiffs	0.3
10.24.13	TC w/Dallas County Elections Administrator re: implementation of SB 14 problems & possible affidavit for prelim. inj. motion & trial testimony	0.4
10.25.13	Call w/DOJ attys and other private plaintiffs' counsel re: pending legal issues in lawsuit, incl. litigation schedule	0.4
10.25.13	Review State's motion to dismiss complaints	0.9
10.25.13	Review notice of appearance for True the Vote atty (0.1)	no charge
10.28.13	Tele. Call w/Jose Garza re: his state court lawsuit filed in Hidalgo Co. challenging SB 14 & impact on our suit.	0.3
10.28.13	Call with all counsel re: E-discovery in lawsuit & scheduling issues. DOJ proposes trial in 2015	0.4
10.28.13	Review pro hac vice motions of TX League (0.1)	no charge
10.29.13	Communication Dave Richards re: getting emails from	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
10.29.13	Travis Countywhere county election officials in TX discussed problems implementing SB 14 (0.2) Tele. Conf. call w/co-counsel (Derfner, Dunn, Simson) & potential expert witness re: TX matching database issues	no charge  0.5
10.29.13	Draft Letter for Marc Veasey re: DOJ trial schedule (0.5)	no charge
10.30.13	Read orders granting pro hac motions (0.1)	no charge
10.30.13	Read responses of U.S. to motion to intervene, w/nine exhibits	0.6
10.30.13	Review draft of Joint Report of Rule 26 & case mangement plan circulated by DOJ attorney (Maranzano)	0.4
10.31.13	Draft inserts for Veasey team and outline of proposed order for insertion into joint report keeping trial schedule	0.5
10.31.13	Discuss Rule 26 Joint Report & discovery and trial issues w/co-counsel (Simson) (1.4)	no charge
10.31.13	Review state court complaint filed in Hidalgo Co. challenging SB 14	0.2
11.1.13	Review & edit re-draft of Rule 26 Joint Report (0.5)	no charge
11.1.13	Distribute Joint Report edits to Veasey legal team &  communicate other edits with legal team (0.3)	  no charge
11.1.13	Review letter sent by TX SOS to voter re: SB 14 and signing affidavit at polls re: name issues	0.2
11.1.13	Distribute letter from TX SOS to Veasey legal team w/comments (0.2)	no charge
11.1.13	Communication w/NAACP counsel re: trial schedule Communications with co-counsel (Dunn/Derfner) re:	0.1
11.1.13	conversation w/TX voter (84 years old) who could not obtain an EIC despite 2 trips to DPS	0.2



<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
11.1.13	Communications w/clients updating status of case/issues	0.3
11.4.13	Review Joint 26(f) report and proposed ESI agreement along with 6 other exhibits	0.6
11.4.13	Read TX AG atty (Clay) proposed edit to scheduling order	0.1
11.5.13	Tele. Conf. call with Veasey legal team re: issues raised by TX in motion to dismiss	1
11.5.13	Read filed corporate disclosure statement by MALC (0.1)	no charge
11.5.13	Communications with TX contact re: Evelyn Brickner, a 96 year old voter who cannot get photo ID despite trips to DPS with documentation	0.3
11.5.13	Communications with TX contact re: Peggy Herman Draper (91 year old voter) who was turned away from DPS and denied EIC because she cannot get documentation.	
	Came to U.S. w/parents from Ellis Island	0.3
11.5.13	Communication w/expert witness (Lichtman) re: analysis of racial intent	0.4
11.6.13	Communications with TX contact re: TX voter who went to polls but was unable to vote due to ID	0.1
11.7.13	Read communications from clients re: voting on 11/5	0.2
11.7.13	Read blog post by TX State Senator Troy Fraser re: TX ID law and voter turnout in 2011-13 elections	0.1
11.7.13	Read certificate of interested parties by TX League (0.1)	no charge
11.11.13	Final revisions & review of litigation hold letter to movant-intervenor True The Vote	0.4
11.12.13	Review Notice of Appearance by TX AG atty (0.1)	no charge
11.13.13	Review motions/orders pro hac vice, notices of appearance for attorneys (0.2)	no charge

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
11.13.13	Review errata Notice filed by U.S.	0.1
11.14.13	Review TX League's amended intervenor complaint (0.3)	no charge
11.14.13	Call w/ co-counsel (Simson/Dunn) re: experts' retainers; identification of lay witnesses, assignments to counsel	1.1
11.15.13	Participate in hearing with court re: motions to intervene, trial date and schedule	0.7
11.15.13	Conf. call w/co-counsel to debrief re: court hearing &  resulting tasks to counsel (discovery doc prep/MTD Review TX Assoc. of Hispanic Co. Judge's complaint (0.3)	0.9
11.15.13		no charge
11.18.19	Read pro hac vice motion (0.1)	no charge
11.18.13	Tele. Conf. call w/private plaintiffs' counsel re: coordination of tasks to avoid duplication	1.2
11.19.13	Review Advisory by State of TX w/attached Ingram Dec. re: trial schedule etc.	0.3
11.20.13	Review Court settings of status conference for 11/21 & 11/22 re: Advisory	0.1
11.20.13	Meet w/ E. Simson to discuss drafting of Joint Response to TX's advisory (0.4)	no charge
11.20.13	Prepare outline for affidavit of Toni Pippins Poole f  to be attached to joint response to TX advisory	0.8
11.20.13	Review Ingram Declaration from DC Preclearance case for joint response to TX advisory/compare to new one)	0.3
11.21.13	Review Disclosures by Defendants TX et al.	0.2
11.21.13	Discuss TX disclosures with co-counsel (0.3)	no charge
11.21.13	Review client Penny Pope Disclosures & exhibits draft prepared by co-counsel (N. Baron) (0.3)	no charge
11.21.13	Review Disclosures by MALC & NAACP	0.1
11.21.13	Review US DOJ response to Advisory re: 9/14 trial date	0.2

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
11.21.13	Discuss US response to Advisory w/co-counsel (Dunn)	0.2
11.21.13	Review disclosures by TX Association of Hispanic Co. Judges and County Commissioners	0.1
11.22.13	Review Scheduling Order by court following hearing	0.1
11.22.13	Review MALC & NAACP Opposition to motion complaint	0.2
11.22.13	Prepared Unopposed motion to Exceed Page limits	0.2
11.22.13	Email all counsel to determine if any oppose motion to exceed page limits	0.1
11.22.13	Review/Edit Opposition to TX's motion to dismiss complaint & amended complaint	1.5
11.22.13	Draft corrected response to TX motion to dismiss (0.3)	no charge
11.22.13	Review US DOJ's response to TX motion to dismiss	0.4
11.22.13	Review Order granting our motion to exceed page limits	0.1
11.25.13	Review notices of appearance filed by Defendants (0.1)	no charge
11.26.13	Review motion pro hac vice filed by MALC (0.1)	no charge
12.1.13	TC w/co-counsel Dunn re: ordering transcript of 11/15 status hearing for possible use in court of appeals (0.2)	no charge
12.2.13	Review pro hac vice orders for multiple counsel (0.1)	no charge
12.2.13	TC w/co-counsel (Veasey -LULAC legal team) re: amending complaint & status of experts	0.6
12.3.13	Review USA motion for protective order (unopposed)	0.2
12.4.13	TC w/co-counsel (Veasey -LULAC legal team) re: adding new plaintiffs, adding new claims in an amended complaint	1.7
12.5.13	Review order granting motion for protective order	0.1
12.5.13	Make final edits to Second Amended Complaint and proofread same	0.4

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
12.6.13	Review transcript order by TX AG (0.1)	no charge
12.6.13	Prepare second amended complaint for clients	1.1
12.6.13	Review TX's reply brief in support of their motion to dismiss complaints and intervenor complaint	0.3
12.10.13	Review TX's motion to dismiss complaints filed by TX Assoc. of Hispanic Judges & TX Young Voters League	0.5
12.11.13	Review order denying Intervention to True the Vote	0.2
12.11.13	Review order granting TX's motion to file out of time motions to dismiss	0.1
12.11.13	Review State of TX motions to dismiss Intervenor complaint and amended complaint	0.2
12.13.13	Review 2012 article (& links) entitled "Racial and Ethnic Differences in Access to Photo-ID in Texas" by Gabriel R. Sanchez, Stephen A. Nuño, & Matt A. Barreto	0.5
12.13.13	Review PA voting rights decision discussing testimony of our expert witness Dr. Barreto	0.3
12.13.13	Communication with Chad Dunn re: Barreto (0.1)	no charge
12.13.13	Review True the Vote notice of appeal	0.1
12.13.13	Email exchange w/E. Rosenberg re: database match	no charge
12.16.13	Review pro hac vice motions (0.1)	no charge
12.17.13	Review TX Hispanic Judges Assoc. response in opp. To Defendants' motion to dismiss	0.2
12.18.13	Review article on True The Vote intervention denial	no charge
12.19.13	Conf. call w/Veasey-LULAC Legal Team about identifying witnesses & division of labor to avoid duplication	0.5
12.20.13	Communication w/E. Rosenberg re: joint reention of expert witness Dr. Matt Barreto	0.1
12.20.13	Review True the Vote new notice of appeal and withdrawal of prior notice of appeal	0.1
12.20.13	Review TX's motion to dismiss Veasey-LULAC complaint for failure to state claim	0.5
12.23.13	Review communication sent to TX AG office by co-counsel (C.Dunn) re: State deadline to answer (0.1)	no charge
12.23.13	Review Notices re: transcripts & notice of appeal (0.1)	no charge
12.27.13	Review communication exchange between Jose Garza & C. Dunn re: Ortiz motion to consolidate ID cases (0)	no charge
12.31.13	Review orders entered granting pro hac motions (0.1)	no charge
<b><u>2014</u></b>		
1.2.14	Communication from Ms. Brandy Cortez re: trial leng	0.1
1.2.14	Communications with other plaintiffs' counsel re: response to court about trial length	0.6
1.2.14	Edit response to Ms. Cortez for Veasey-LULAC plainti	0.2
1.3.14	Communication with expert witness Dr. Barreto re: database matching protocols	0.2
1.3.14	Communications with E, Rosenberg re: database match	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	protocols	0.2
1.8.14	Prepare listing of all persons to be deposed in lawsuit with titles and relevance	0.4
1.8.14	TC w/Veasey-LULAC Legal Team re: legal strategies, upcoming deadlines, division of assignments, issues raised by TX's 2nd MTD	0.8
1.8.14	TC with co-counsel (Armand Derfner and Emma Simson) re: discuss due process claims for inclusion in brief	0.6
1.9.14	Review draft of our brief arguing why we pled sufficient facts that state a claim for due process violations	0.4
1.9.14	Review C. Dunn's list of possible more deponents sent to co-counsel	0.2
1.9.14	Review Carter-Baker Commission report re: why States should delay implementation of IDs to ensure orderly transition	0.3
1.9.14	Review communication from co-counsel (Derfner) to other private plaintiffs' counsel re: standing & due process no charge	
1.9.14	Read communication from State AG atty (Clay) to DOJ re: common interest agreement among plaintiffs	0.1
1.10.14	Revise brief in opposition to State's motion to dismiss	1.1
1.10.14	Review Order consolidating cases	0.1
1.10.14	Review communications between Veasey-LULAC counsel and other plaintiff's counsel re: use of Dr. Barreto & cost of conducting of additional survey (0.2) no charge	
1.10.14	Final edits to brief in opp. to motion to dismiss & proposed Order	0.2
1.13.14	Review Order granting Motion re: 2nd Amend. Comp no charge	
1.13.14	TC to discuss pending and planned discovery; and our answers to interrogatori	0.3
1.17.14	Call with DOJ attorneys re: fact discovery needed	0.4
1.19.14	TCs w/Elizabeth Westfall (DOJ atty) re: proposed protective order sent to DOJ by TX AG	0.2
1.21.14	TC with Veasey-LULAC Legal Team re: difficulties w/making complete answers to TX's discovery requests & the scope of work to be done by our various experts	1.2
1.22.14	Call w/ other plaintiffs' counsel re: experts' areas to cover, depositions to be taken; common interest agreemen	0.9
1.28.14	TC w/co-counsel (Dunn, Simson) & expert witness re: calculating and reviewing algorithms	0.3
1.29.14	Meeting w/ Dr. Lichtman (& Simson) re: preparing his expert report (data needed, topics to be covered)	1
2.3.14	Review amended Complaint filed by TX Assoc. of Hispanic County Judges	0.2
2.3.14	Call w/ DOJ counsel re: database matching process	0.8
2.3.14	Call with our experts re: database matching procedu	0.7

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
2.4.14	Tele. Conf. w/plaintiffs' counsel for other parties re: depositions (identifying deponents; division of labor	0.6
2.4.14	Review Order granting leave to file TX Assoc. amend. Complaint (0.1)	no charge
2.4.14	Review Order re: Amended Pleadings	0.1
2.4.14	Review Order re: pro hac vice motions (0.1)	no charge
2.5.14	Review DOJ atty (Shapiro) pro hac vice motion (0.1)	no charge
2.5.14	TC with Veasey-LULAC Legal Team re: experts' data needs; trial schedule; identify future depositions to be take	1.1
2.6.14	Receive TX's proposed algorithm & discuss same with co-counsel (Simson, Derfner)	0.3
2.6.14	Communications w/co-counsel Derfner/Baron/Dunn re: edits to Rule 30(b)6 Deposition to TX SOS & timing	0.3
2.6.14	TC with Veasey-LULAC Legal Team re: hiring additional experts on voter fraud/spending by TX to implement	1.3
2.7.14	Communications with co-counsel re: DOJ's motion to be filed seeking to delay trial date & other deadlines	0.4
2.7.14	Review Communication from Ms. Brandy Cortez re: length of time for upcoming hearing next week	
2.7.14	Review DOJ's Rule 30(b)6 Notices of Deposition served today on all counsel	0.2
2.8.14	Review State Rep. Harless communication to constituents on photo ID requirements	0.1
2.10.14	Edits to 30(b)6 Notices of Deposition & communicate edits to NAACP LDF counsel (Haygood/Korgaonkor)	0.3
2.10.14	Review Veasey-LULAC draft response to US proposed order on database protocols/discuss same w/E. Simson (1.1	no charge
2.11.14	Communication to DOJ attys that we oppose the motion to change the trial schedule	0.1
2.11.14	Review Veasey-LULAC Opposition to DOJ's motion re	0.3
2.11.14	File Opposition through ECF (0.1)	no charge
2.11.14	Review joint motion by U.S. DOJ for discovery Order & supplemental protective Order	0.6
2.11.14	Review Joint response in Opposition to DOJ and TX's Joint motion for Discovery Order & supp. Prot. Order	0.5
2.11.14	Review U.S. Motion to Compel Legislative Docs	0.4
2.12.14	Participate in hearing with court re: motions to Compel and status of case	0.8
2.12.14	Conf. call w/Veasey-LULAC Team re: debrief issues discussed at court hearing and next steps	0.2
2.13.14	Communication from E. Rosenberg re: briefing of legis. privilege issue (0.1)	no charge
2.13.14	TC with DOJ legal counsel re: our position on trial schedule & DOJ's reasons for seeking to move trial to 2015	0.5
2.13.14	Communicate reasons to Veasey-LULAC trial team for not moving trial date & how we	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	can accommodate DOJ's concerns re: other deadline	0.4
2.14.14	Communications with Veasey-LULAC legal team re: TX's position re: sharing databases w/U.S. and how it might affect us going forward	0.3
2.14.14	Hearing with court on database issues (i.e., Attachment 3 of ECF 161 & TX's response to same	0.4
2.14.14	Conf. call w/Veasey-LULAC team re: our proposed modifications to agreed order on databases	0.4
2.14.14	TC w/other plaintiffs' counsel to discuss coordination in case going forward	0.3
2.14.14	Review order denying U.S. Motion to amend sch. orc	0.1
2.14.14	Review U.S. Notice re: Agreement on Discovery Orde	0.1
2.18.14	Review Order re: discovery & supp. Protective order	0.1
2.18.14	Review TX's motion to dismiss for failure to state clai	0.2
2.21.14	Review U.S. motion for protective order	0.3
2.23.14	Draft motion pro hac vice for co-counsel Emma Sims	0.2
2.23.14	Review draft of supplement to motion to compel production of legis. Docs	0.3
2.24.14	Review TX's opposition to motion to compel leg. Doc	0.4
2.25.14	Review order granting E. Simson pro hac vice motion no charge	
2.27.14	Review Hidalgo Co. motion to add party & response to motion to dismiss (0.3) no charge	
2.28.14	Review U.S. reply memo re: motion to compel leg. D	0.3
2.28.14	Meeting w/DOJ counsel and other plaintiffs' counsel to discuss outstanding issues & databases & analyzin	2
3.5.14	Briefing from C. Dunn on results of hearing held toda no charge	
3.6.14	TC w/plaintiffs' counsel re: depositions needed; leg p	0.8
3.6.14	Call w/ Veasey-LULAC Team re: leg privilege issue	0.8
3.12.14	Draft further response (supplemental) re: motion to compel leg. Docs	0.4
3.12.14	Review Joint Supp. To motion for production of legis	0.2
3.13.14	Review U.S. joint motion to modify scheduling order	0.1
3.13.14	Review U.S. supplemental filing Re: motion to compel leg. documents	0.2
3.13.14	Review TX filing of supplemental brief	0.3
3.14.14	TC w/Veasey-LULAC legal team re: next steps for subpoenas and depositions	0.8
3.17.14	Review TX response to U.S. motion for protective orc	0.2
3.21.14	Review U.S. reply in support of U.S. motion to compe	0.3
3.25.14	Review TX's response opposing Motion to jt. motion to Modify Scheduling Order	0.2
3.25.14	Review U.S. correction to reply re: Protective Order I	0.1
3.26.14	TC w/Veasey-LULAC Legal Team re: who to depose, division of duties re: same, scheduling of same	0.8
3.26.14	TC w/all plaintiffs' counsel, discuss: schedule coordination, deposition assignments/scheduling, upcoming 4/1 h	0.7

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
3.27.14	Review pro hac motion & order granting same (0.1) no charge	
3.28.14	Review letter re: record on appeal (True The Vote ap	0.1
3.31.14	Final edits & review of our Advisory to Court	0.2
3.31.14	Review U.S. motion to file a reply memo with numerous attachments (relates to scheduling Order)	0.4
3.31.14	Review TX notice of filing	0.1
3.31.14	Review motion to file amicus curiae brief & brief by Bipartisan Legal Advis. Group of U.S. House	0.4
3.31.14	Read TX's surreply opposing motion to amend sched. order	0.2
4.1.14	Review Correction Notice filed by State of Texas (0.1 no charge	
4.1.14	Participate in court hearing on various motions (compel, amend scheduling order)	1.6
4.2.14	Review TX Notice re: miscel. Hearing	0.1
4.2.14	TC w/Veasey-LULAC Legal Team re: depositions & other planned discovery, positions taken at 4/1 hearing, next discovery actions to be taken, trial schedule	1.1
4.3.14	Review order granting in part/denying in part U.S. Motion to Compel	0.1
4.3.14	TC w/all private plaintiffs' attys re: coordinate discovery, avoiding duplication, division of duties	0.8
4.4.14	Review U.S. chart comparing deadlines in competing Scheduling orders (current and U.S. Proposed)(fr. We	0.1
4.4.14	Discussion with private plaintiffs' counsel re: deciding which state legislators will be deposed in light of the 60 deponent cap	0.3
4.6.14	Review draft interrogatories and RFP and edit same	0.4
4.7.14	Meet w/Veasey-LULAC co-counsel in DC to plan discovery, discuss all of the followign: possible trial issues, litigation budget, retaining additional experts, idenitification of additional fact witnesses, due process claim, discriminatory intent facts and how to develop additional evidence on intent by review SB 14 rejected amendments, assignment to counsel of depositions, assignment of drafting responses to pending discovery, documents to be provided to our current experts & what analyses we want them to pe	7.1
4.7.14	Review 2 Notices of Deposition served by Texas (Deponents: Hernandez and Espinosa)	0.1
4.7.14	Review Draft by USA of a revamped proposed sc	0.2
4.7.14	Review U.S. court filing of 2nd Amend. Scheduling	0.1
4.7.14	Review TX's Advisory to Court re: proposed trial sche	0.2
4.7.14	Discuss TX's Advisory with other counsel (Posner)(.2) no charge	
4.7.14	Review motion By TX Defendants w/attachments seeking to compel production of documents by U.S.	1.1
4.7.14	TC w/DOJ attys & private plaintiffs' counsel re: agreement	



<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	to provide TX w/status of data runs by Fed. Agencies	0.5
4.7.14	Review summary sent to all private plaintiffs' counsel	
	re: TC with DOJ re: data runs by fed. agencies (0.1) no charge	
4.7.14	Review correspondence from K. Dunbar with Rule 30(b)(6)	
	Notice of Deposition to TX & accompanying subpoena	0.3
4.8.14	Meet w/Veasey-LULAC co-counsel in DC to plan discovery, discuss all of the followign: possible trial issues, litigation budget, retaining additional experts, identification of additional fact witnesses, due process claim, discriminatory intent facts and how to develop additional evidence on intent by review SB 14 rejected amendments, assignment to counsel of depositions, assignment of drafting responses to pending discovery, documents to be provided to our current experts & what analyses we want them to pe	10.3
4.8.14	Review Amended Scheduling Order	0.1
4.8.14	Discuss w/plaintiffs' counsel (Rosenberg) setting up call with TX counsel (Scott) to iron out trial scvhedule issi	0.1
4.8.14	Review communication to TX's counsel (Scott) re: call to discuss trial length & discovery issues/dates	0.1
4.8.14	Review communications back and forth with TX counsel (Scott) re: call to discuss trial disagreements (0.2) no charge	
4.8.14	Review discovery documents served on eight of our clients served by Texas	0.4
4.8.14	Review docs produced by TX pursuant to motion to compel (legis. docs)	0.5
4.8.14	Confer w/co-counsel (Dunn) & draft a list of possible deponents (15-20) that Veasey-LULAC wants to depc	0.4
4.8.14	Send list of possible deponents to plaintiffs' counsel no charge	
4.8.14	Review Crivela protocols for our expert to access document data base	0.3
4.8.14	Review Protective Order to ensure our experts are authorized to access the confidential docs in databas	0.2
4.9.14	Meet w/DOJ counsel in DC to discuss case strategy and assignment of responsibilities	1.1
4.9.14	Meet with co-counsel (Simson, Derfner) to plan discovery strategy and assignments to avoid duplication	2.5
4.9.14	Meet with counsel for NAACP (Posner) to coordinate litigation responsibilities & strategies	1
4.9.14	Review communication from TX counsel (Scott) re: deposition availability of Zgabay and Gipson	0.1
4.9.14	Communications w/clients re: document production responsive to State's discovery requests	0.3
4.9.14	Communication w/State of TX contact (Gabriel) re: difficulty access files sent by TX (0.2) no charge	
4.9.14	Review agenda for tomorrow's all counsel call with State of TX/DOJ	0.2

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
4.9.14	Review emails I exchanged w/DOJ counsel (Bell-Platts) that TX is seeking to obtain from DOJ in motion to compe	0.4
4.9.14	Review docs provided by clients (Veasey and Hamilton) per TX's request for production	0.1
4.9.14	Review communication from R. Rios to TX AG atty (Scott) re: extension of time to respond to discovery (0.1) no charge	
4.9.14	Review our (Veasey-LULAC) draft interrogatories & R	0.4
4.9.14	Review draft of Texas League Young Voters plaintiffs' responses/objections to TX's RFPs sent to their client	0.3
4.9.14	Meet w/Veasey-LULAC co-counsel in DC to plan discovery, discuss all of the followign: possible trial issues, litigation budget, retaining additional experts, idenitification of additional fact witnesses, due process claim, discriminatory intent facts and how to develop additional evidence on intent by review SB 14 rejected amendments, assignment to counsel of depositions, assignment of drafting responses to pending discovery, documents to be provided to our current experts & what analyses we want them to perform, division of labor re: handling experts	2
4.10.14	Review draft of op-ed by client (Cong. Veasey) re: how TX leaders are engaging in vote suppression (0.3) no charge	
4.10.14	Review sets of discovery docs served on our clients and in some cases second sets of discovery served by TX	0.7
4.10.14	Begin drafts of responses to discovery for our clients	1.1
4.10.14	Meet with co-counsel (Simson) re: "to do" items (1.2 no charge	
4.10.14	Call with all counsel	0.5
4.10.14	Draft communication w/Simson to co-counsel for Veasey-LULAC detailing possible analyses to be performed by our expert (Herron) on substantially similar names	0.5
4.10.14	Prepare deposition notice for Harris County election official (Stanart)	0.3
4.10.14	Review local rules in SD TX re: video depositions	0.1
4.10.14	Tele call with DOJ counsel (Westfall) & NAACP counsel (Rosenberg) re: docs to be produced & common interest caselaw and privilege issues	0.4
4.10.14	Review/edit communication to be sent to DOJ by co-counsel (Simson) re: draft discovery we hope to send Monda	0.2
4.10.14	Communications w/E. Rosenberg re: trial dates and how to resolve length of trial dispute w/TX	0.2
4.10.14	Review Ortiz plaintiffs' disclosures	0.1
4.11.14	Tele. Call w/all plaintiffs' counsel re: fact discovery, locating provisional voters due to ID	0.8
4.11.14	Review/edit draft communication to NAACP atty (Perez) re: dividing list of voters to be contacted who were forced to vote provisionally due to ID	0.2
4.11.14	Review letter from TX AG atty (Whitley) to DOJ re: docs	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	being produced, withdrawal of atty-client privileges as to certain docs, leg. Privilege log. Review included all documents attached to Whitley's letter	0.9
4.11.14	Review our clients' documents and decide which parts need to be redacted (e.g., SS#, DOB,)	0.2
4.11.14	Review unopposed motion to drop plaintiffs and order granting same (0.2) no charge	
4.11.14	Communications with E. Rosenberg and co-counsel (Baron) re: deposition assignments and division of labor to ensure efficiency and avoid duplication of effort	0.3
4.11.14	Meet with co-counsel (Simson) to discuss retention of two additional experts (a Queing expert & an Information Acquisition Expert)	0.6
4.11.14	Review motion and order re: withdrawal of TX counsel (Flammer)(0.1) no charge	
4.13.14	Review draft of advisory from E.Rosenberg re: trial protocols to be submitted by all plaintiffs	0.7
4.13.14	Make edits to draft advisory re: trial protocols and circulate same to plaintiffs' counsel	0.6
4.14.14	Final review of Advisory on trial protocol (0.3) no charge	
4.14.14	Review Amended Motion to Compel filed by TX (Scott) with attachments	0.9
4.14.14	Review Supplemental response of TX to motion to compel production of legislative docs with attachments and privilege log	0.8
4.15.14	Review notice of appearance by TX AG office (Roscoe) no charge	
4.15.14	Review notice setting hearing on TX's motion to com	0.1
4.15.14	Communications re: covering deposition in Austin for Veasey-LULAC plaintiffs (w/Korgaonkar & Baron)(0.3 no charge	
4.16.14	Participated in proceedings held before Judge Ramos re: amended motion to compel & setting of status conf. (joined 2 minutes late due to bad phone connection)	0.3
4.16.14	Communications with other counsel (Dunbar) re: scheduling DPS Peters' 30(b)6 depo & communication from DOJ Re; scheduling Peters' deposition	0.2
4.16.14	Call with DOJ attys (Bell-Platts & Westfall) & E. Rosenberg re: weekly calls among all plaintiffs' counsel to conserve resources, promote efficiency, avoid duplication of tasks, and coordination among all counsel	0.5
4.17.14	TC w/ all private plaintiffs' counsel re: expert witnesses we retained, data needed and scheduling of depositions	1
4.17.14	Review letter & discovery docs served by TX AG (Scott) on Veasey-LULAC plaintiffs	0.7
4.17.14	Review master litigation calendar prepared by Deche no charge	
4.21.14	Review document re: production format for providing our discovery responses to Texas to ensure complian	0.2

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
4.21.14	Tel. call with expert witness (Herron) & co-counsel (Dunn, Simson) re: analysis to be performed	0.3
4.22.14	Review notice of appearance by TX AG office (Donne no charge	
4.22.14	Communications w/TX officials re: accessing their uploaded documents on	
4.22.14	Review letter from TX AG atty (Scott) to Kelly Dunbar re: service of Notice of Deposition on State of TX/subpo	0.1
4.23.14	Review & edit listing of all depositions currently sche	0.1
4.23.14	Review communication from TX re: moving status hearing to 5/15	0.1
4.23.14	Discuss w/co-counsel whether to agree to TX's requested change in date of status conference & impact on sch	0.2
4.23.14	Review TX's Objections and Responses to the 30(b)(6) Notice of Deposition/Subpoena on behalf of TX AG	0.4
4.24.14	Review allocation of depositions to various plaintiffs' legal teams sent to us by E. Rosenberg	0.1
4.24.14	Call with Veasey team re: Ingram depo & other discovery needed, coordination of same & assignments	1.5
4.24.14	Review TX Supreme Court decision on common interest privileges/allied litigant doctrine (legal research)	0.4
4.24.14	Review letter from TX AG atty (Clay) that TX inadvertently produced documents that were privileged	0.1
4.24.14	Took action pursuant to Agreement Re: Production F	0.2
4.24.14	Tele conf. call w/Veasey-LULAC legal team re: updates from each atty on assignments; future deadlines; drafting of final responses/objections to discovery; litigation assignments; legal research of issues needed	1.5
4.24.14	Review objections and responses by TX League of Young Voters to TX's discovery (we should use this as a guide in finalizing our objections/responses due next week	0.3
4.24.14	Review Interrogatory draft responses from TLYV atty (Korgaonkar) and other discovery responses (0.5) no charge	
4.24.14	Review notice setting status conference w/court for	0.1
4.25.14	Review motion to quash subpoenas on 3rd party legi	0.5
4.25.14	Review US's Motion to take judicial notice of census & other attachments	0.3
4.25.14	Review edit a list of documents that the TX failed to produce in response to our discovery relating to their voter ID education program	0.2
4.25.14	Conference call with private plaintiffs' counsel	0.4
4.25.14	Call with experts re: future scheduling	0.6
4.25.14	Review letter from TX AG atty (Clay) to Swarns (LDF) re: discovery responses by TX League of Young Voters	0.2
4.25.14	Conference call with private plaintiffs' counsel (and l	0.6
4.25.14	Draft outline for open records request to counties	0.4
4.25.14	Review Open Records Requests Tracker of TX counti no charge	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
4.25.14	Review TXs Amended Notice of Deposition for E. Esp	0.2
4.26.14	Communications w/co-counsel (Veasey-LULAC) re: TX's production of documents but failure to identify sourc	0.3
4.27.14	Review/edit draft interrogs. & objections on behalf of each of our clients (drafted by N. Baron)	0.6
4.27.14	Review outline prepared by co-counsel (Derfner) of deposition questions to be asked of DPS deponent	0.2
4.28.14	Communications with E. Rosenberg re: our draft discovery discovery responses & preserving privileges by other plaintiffs' preparing privilege logs	0.2
4.28.14	Review notice setting 5/1 hearing mot. to quash subp	0.1
4.29.14	Review for filing final draft of response in opposition to motion to quash subpoenas issued to third party l	0.2
4.29.14	Communication to co-counsel re: marking docs "highly confidential" (0.1) no charge	
4.30.14	Communications to LULAC General Counsel re: discovery responses on behalf of LULAC to TX's Req. for Production & LULAC 30(b)(6) deposition person(s) for LULAC	0.3
4.30.14	Review 5th cir. Brief filed by True the Vote	0.7
4.30.14	Review/edit final version of LULAC responses to disc	0.6
4.30.14	Prepare/Send LULAC discovery responses to all coun no charge	
4.30.14	Review documents received from Tarrant County in reply to Open Records Request	0.7
4.30.14	Meet w/ co-counsel (Simson) re: Bates stamping Tarrant docs & serving updated discovery responses to TX (C no charge	
5.1.14	TC w/all private plaintiffs' attys re: issues at hearing	0.8
5.1.14	TC w/all private plaintiffs' attys & DOJ re: 5/1 hearing and other discovery	
5.1.14	Email exchanges (8) with Reed Clay re: scheduling depos. of Cong. Veasey & Hamilton	0.1
5.1.14	Read TX Legis. Council's objections to subpoena reco	0.2
5.2.14	Review draft agreement on sharing deposition costs among all private plaintiffs	0.1
5.2.14	Review & final edits to 2nd set of RFPs to TX Defend	0.3
5.8.14	TC w/all private plaintiffs' attys re: discovery coord.	1
5.8.14	TC w/all private plaintiffs' attys & DOJ re: data bases, expert analysis, and other discovery	0.7
5.9.14	Review TX Notice and Attachments (OIG report, etc.)	0.3
5.12.14	TC w/all plaintiffs' attys re: TX meet & confer on disc	0.9
5.12.14	TC w/ Veasey-LULAC team re: experts, witnesses, depos, discovery planning	1.1
5.12.14	TC w/all counsel (incl. TX) re: meet & confer on discovery disputes/issues	1.7
5.13.14	Review and edit draft opposition to motion to expedite filed by True the Vote	0.6
5.15.14	Review/edit draft meorandum in opposition to True the Vote's	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	motion to expedite appeal or stay proceedings	2.1
5.16.14	Final edits to Opposition to TTV stay & motion to exp	0.8
5.19.14	TC w/Veasey-LULAC team re: costs, next steps, trial plans planned discovery, expert timetable (& data needed)	1.8
5.22.14	TC w/all private plaintiffs re: outstanding & future di	1.1
5.22.14	Call w/all plaintiffs (including DOJ) re: discovery	0.9
5.22.14	TC Conference call with TX re: discovery disputes/iss	1.3
5.22.14	Conf. call with Veasey-LULAC expert witnesses to discuss expert reports, scheduling, depositions, timing issue	0.5
5.23.14	TC with expert witness (Lichtman) & co-counsel (Simson) re: items needed, expert report scope & analysis, tim	1
5.27.14	Draft Memorandum for court filing re: TEAM databa	1.2
5.28.14	Addition edits to Memo for court filing re: TEAM dat	0.9
5.28.14	File Veasey-LULAC Memo on TEAM database (0.1) no charge	
5.28.14	Participate in hearing before Judge Ramos re: motion for protective order, filing of joint statements, TEAM dal	0.4
5.28.14	TC with TX & plaintiffs re: TEAM data	0.7
5.28.14	Tele conf. w/Veasey-LULAC team re: data bases, discovery plans & strategy, expert info needed for reports	0.3
5.29.14	TC w/private plaintiffs (weekly status call to coordin	1
5.29.14	TC w/all plaintiffs (including DOJ) (weekly status)	0.5
5.30.14	TC w/Veasey-LULAC team re: discovery, data, next st	1.5
6.3.14	Call w/Dr. Lichtman re: items needed for his report (also co-counsel in the call--Simson, Derfner)	0.8
6.3.14	TC w/Veasey-LULAC team re: outstanding assignments and status of same; expert reports' issues & data needed; discovery needed; possible victims/witnesses to be contacted.	1.6
6.4.14	Meet with client (Jane Hamilton) to prepare for depc	1.8
6.5.14	Defend Client's deposition (Jane Hamilton)	2.6
6.5.14	TC w/all private plaintiffs re: continued coordination of tasks going forward; assignments to different plaintiffs; status of discovery and division of labor.	0.9
6.5.14	TC w/all plaintiffs (including DOJ) (weekly status call to discuss coordination/database matching/planning of further discovery)	0.7
6.6.14	Call with Dr. Lichtman re: additional legis.history and court court records needed for his report	0.9
6.6.14	Court hearing re: database order, common interest privilege & motions to quash legislative 3rd party depos	1
6.10.14	Review TX Motion to compel w/exhibits	0.5
6.11.14	Review U.S. Notice of Consent Order re: Status Confe	0.1
6.10.14	TC w/Veasey-LULAC team re: outstanding assignments and status of same; expert reports' issues & data needed; discovery needed; status of identifying possible victims of ID law & possible trial witnesses; status of	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	work being performed by experts.	1.9
6.10.14	Meet w/co-counsel (Simson) re: issues/data analysis to be performed by expert (Dr. Heron). (E. Simson to contact Dr. Heron re: these issues	0.3
6.11.14	Review TX motion on federal databases	0.3
6.11.14	Meet w/co-counsel (Simson) re: preparing a response to TX motion on federal databases	0.3
6.12.14	Meeting with all plaintiffs to review status of all discovery; division of tasks; expert witnesses retained; meeting trial schedule	3
6.16.14	Call with Cong. Veasey re: deposition preparation	0.8
6.16.14	TC w/Veasey-LULAC team re: outstanding assignments and status of open records requests and federal data	0.8
6.17.14	Additional deposition prep w/Cong. Veasey	1.3
6.18.14	Court hearing re: motion to compel/protective order	1.2
6.18.14	Review Order denying motions to quash	0.2
6.19.14	TC w/Veasey-LULAC team re: outstanding assignments and status of same; expert reports' issues & data needed; pending discovery motions; status of identifying possible witnesses; discuss deposition transcripts to be review	1.3
6.19.14	Deposition prep meeting w/Cong. Marc Veasey	1.5
6.20.14	Defend deposition of Cong. Marc Veasey	3.4
6.20.14	Review Motion to Quash TX Subpoenas by TX Senatc	0.3
6.20.14	Review Supplemental Disclosures filed by TX League no charge	
6.24.14	Review and edit attachments to expert report of George Korbel	1.6
6.25.14	Review 2nd Supp. Disclosures by MALC/NAACP (0.2) no charge	
6.26.14	Review Motion for Protective Order by USA	0.3
6.26.14	Review Report of our experts Drs. Baretto & Sanchez no charge	
6.26.14	Review Report of our expert George Korbel & edit same/ Also made edits to attachments	2.2
6.27.14	Review final amended disclosures by Veasey LULAC ( no charge	
6.27.14	Review draft expert report of Dr. Lichtman	1.9
6.27.14	Communication to expert witness re: sources of cens	0.3
6.27.14	Review Report of our expert Buck Wood (1.1) no charge	
6.27.14	Review Supp. Disclosures by TX defendants	0.2
6.27.14	Review Veasey-LULAC filing of designating expert witnesses and comment on same (0.2) no charge	
6.28.14	Review expert report of Dr. Webster	2.1
6.28.14	Review expert report of Dr. Burden	1.6
	Review expert report of Dr. Yair Ghitza	1.7
	Review expert report of Dr. Jane Henrici	1
6.30.14	Review corrected report of Dr. Webster by U.S.	0.1
7.1.14	Review Orders re: captioning and excess pages	0.1
7.1.14	Weekly Call w/ all private plaintiffs to review status of discovery/division of tasks; expert witnesses retained;	



<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	upcoming deadlines	0.8
7.1.14	Weekly Call w/ all plaintiffs (incl. DOJ); update on database matching issues; identification and coordination of tasks to be performed by plaintiff groups; status of what plaintiff groups are working on.	0.7
7.2.14	Call with Veasey-LULAC legal team re: expert reports	1.5
7.2.14	Call with Veasey-LULAC legal team re: order entered on TX's motion to dismiss and contacting clients re: sam	0.8
7.7.14	Review correction to report of Dr. Burden by U.S.	0.1
7.8.14	Review correction to report of Dr. Chatman by MALC	0.1
7.9.14	Review plaintiffs' judicial notice filing on behalf of cli	0.1
7.10.14	Review Texas League of Young Voters' motion to con	0.1
7.10.14	Review Orders re: deadlines and judicial notice	0.1
7.10.14	Review final draft of Veasey-LULAC supplemental disclosures prepared by co-counsel (Baron)(0.2) no charge	
7.11.14	Review TX's response to motion to Quash Texas' Sub	0.3
7.14.14	Review TX motion for extension of time/expert rebui no charge	
7.15.14	Call w/DOJ, private plaintiffs re TX motion on expert	0.3
7.15.14	Call w/all parties on TX motion on expert reports dea	0.2
7.16.14	#2 call w/all parties on TX motion on expert reports c	0.3
7.16.14	Review Court Notice setting status conference on 7/	0.1
7.16.14	Review various answers to complaints and amended complaints filed by State of TX	0.8
7.17.14	Review Second Amended Scheduling Order	0.1
7.17.14	Review TX's Response to motion to compel that was filed by Texas League of Young Voters	0.2
7.17.14	Review TX's response to motion for a protective orde	0.2
7.17.14	Draft/Edit motion to compel to be filed against TX re: failure to respond to interrogatories	1.6
7.18.14	File motion to compel (0.1) no charge	
7.18.14	Review Answers to Complaints filed by State of TX	0.8
7.18.14	Review reply filing by TX Democratic Senators re: motion to quash	0.3
7.21.14	Review response opposing motion to compel Interrog. Answers filed by Estrada. et al.	0.1
7.21.14	Review 2nd Corrected Report of Dr. Chatman by MALC and NAACP	0.1
7.21.14	Review and Draft Dallas County amicus motion	0.3
7.22.14	Final edits to Dallas County amicus motion	0.2
7.22.14	Review and make final edits to our response in opposition re: motion to compel (0.3) no charge	
7.22.14	Review Advisory to Court filed by State of TX	0.2
7.22.14	Draft Opposition to TX's Advisory	0.5
7.22.14	Final edits to Opposition to Advisory and file same (0 no charge	
7.23.14	TC w/Veasey-LULAC legal team to discuss depositions and	



<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	expert witness reports	0.5
7.23.14	Review TX Response to Opposition to motion to qua:	0.3
7.24.14	Participate in hearing before Judge Ramos re: motions for protective order, to compel. Advisory will be heard l:	1.3
7.24.14	Review Order granting in part/denying in part Motion for Protective Order	0.1
7.27.14	Review TX's motion to compel discovery re: election crimes and voter fraud (and attachments)	1.1
7.28.14	TC w/Veasey-LULAC legal team re: county depositions and deposition of client F. Carrier	0.8
7.29.14	Review 5th circuit order in True the Vote appeal denying motion to stay but expediting appeal	0.1
7.30.14	Participate in court hearing re: TX motion to compel election crime data. Judge Ramos sets 8/4 deadline for respo	0.2
7.31.14	TC w/Veasey-LULAC legal team re: expert reports and expert depositions	1.3
8.1.14	Review Supplemental Disclosures filed by TX	0.2
8.1.14	Review TX's Expert Witness List	0.2
8.2.14	Legal research cases TX's experts have testified or filed reports in	2.1
8.4.14	TC w/Veasey-LULAC legal team re: depositions; status of team assignments; expert reports & depositions	1.1
8.4.14	Communication from TX AG office atty re: Lichtman i	0.1
8.4.14	Communication w/Dr. Lichtman re: deposition dates	0.1
8.4.14	Review U.S. Response in Opposition to motion to compel discovery re: election crimes	0.3
8.5.14	Communication w/TX AG atty re: location of Lichtman deposition and if in TX, they have to pay Lichtman tr:	0.2
8.5.14	Communication w/Dr. Lichtman re: deposition locati no charge	
8.5.14	Meeting with all plaintiffs' counsel to discuss discovery motions, upcoming hearing; depositions of expert witnesses trial preparations	4.5
8.5.14	Meet and confer w/TX AG attys re: discovery motior	0.9
8.6.14	Meet and confer again w/TX AG attys re: discovery r	0.5
8.6.14	TC w/Veasey-LULAC legal team to prepare for court hearing later today	0.4
8.6.14	Participate in court hearing re: TX motion to compel election crime data	1
8.6.14	TC w/Veasey-LULAC legal team to discuss results of today's court hearing; next tasks needed to be performed and made legal team assignments	0.7
8.6.14	Review TX's motion to compel discovery	0.3
8.7.14	Review U.S. Motion to Strike Answer to Complaint	0.2
8.8.14	Review U.S. Motion to have discovery rresponses by TX deemed admitted	0.5

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
8.10.14	Review motion for filing by all private plaintiffs seeking to strike TX's Answer as Inadequate (0.5) no charge	
8.11.14	Review Third Amended Scheduling Order from Judge	0.1
8.11.14	Calendar Dates in Third Amended Scheduling Order ( no charge	
8.11.14	Review Joint Response Draft Opposing Motion to compel to be filed by Veasey-LULAC plaintiffs, MALC & NAAC	0.2
8.12.14	Review U.S. Opposition to TX's motion to compel	0.3
8.13.14	Communication with Dr. Lichtman about changed depo date in DC	0.1
8.13.14	Review TX's motion to compel filed today	0.3
8.13.14	Defend Marc Veasey deposition	
8.14.14	Particpate in court hearing on various discovery mot	0.5
8.15.14	TC w/Veasey-LULAC legal team re: drafting of findings of fact and conclusions of law (Emma has been drafting); also discussion of deposition designations for filing with c	0.6
8.15.14	Review Supp. Expert reports of Burden & Webster filed by U.S.	0.4
8.17.14	Final Review and edits to expert reports of Dr. Baretto & Sanchez	0.2
8.18.14	Review Advisory to court filed by U.S.	0.1
8.19.14	Review and edit our exhibit list, exhibits, depo desigr	2
8.20.14	Review TX Advisory with exhibits	0.4
8.20.14	Prep for Dr. Lichtman deposition	2
8.20.14	Review docs in preparation for Dr. Lichtman depositi no charge	
8.20.14	Review draft findings of fact on discriminatory result	1.6
8.21.14	Review Order entered by Judge Ramos following hea	0.1
8.21.14	Communication w/DOJ attorney (Westfall) re: standi	0.2
8.21.14	Communciations with TX AG atty (Whitley) re: changing time of pre-trial conference	0.1
8.21.14	Defend Deposition of Dr. Lichtman	7.1
8.22.14	Review Dr. Ansolabehere Analysis	2
8.22.14	Attend Deposition in DC of Dr. Ansolabehere	2.2
8.22.14	Review TX's motion to compel and exhibits	0.5
8.22.14	Review U.S. Motion in Limine re: admitting prior trial testimony and depositions from DC case	0.3
8.22.14	Review U.S. Motion to admit County witness Declarations with exhibits	0.3
8.22.14	Review TX's opposition to motion seeking to have their responses deemed admitted (w/exhibits)	0.6
8.22.14	Review TX pre-trial order filing with witnesses, etc.	0.5
8.22.14	Start review of TX proposed FOF and COL	0.9
8.23.14	Call with all plaintitffs' counsel witnesses at trial	0.7
8.23.14	Review draft listing of order of witnesses to be callec	0.2
8.25.14	Review communication from Ms. Cortez about various motions before Court & inquiring if Court needs to re	0.1
8.26.14	Review Josh Bone's pro hac vice motion	0.1

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
8.26.14	Review ruling on motion seeking entry of order	0.1
8.26.14	Draft Stipulations on individual plaintiffs' standing/in	0.5
8.26.14	Call w/Veasey-LULAC legal team on pre-trial prep. & stipulations	0.5
8.27.14	Review State of TX exhibits and prepare objections to same (note all plaintiffs divided TX's voluminous exhibits)	0.9
8.27.14	Participate in pretrial conference; court rules on various motions (to strike, in limine, to admit county declara	1.4
8.27.14	Participate in status conference with court on issue involving use of members' documents at trial	0.7
8.27.14	TC w/Veasey-LULAC legal team re: trial prep assignm	1.9
8.28.14	Participate in hearing before Judge Ramos on issue involving use of members' documents at trial	0.7
8.28.14	Review filed Exhibit List for non-party Senators	0.1
8.28.14	TC w/Veasey-LULAC legal team: add. trial prep assignr	1
8.28.14	Review our objections to defendants' exhibits (joint f	0.2
8.28.14	Review our deposition designations (joint filing)	0.3
8.28.14	Final Review of all our exhibits	1.1
8.28.14	Finalize arrangements and funding for trial transcript no charge	
8.29.14	Review amended expert report of Bazelon by TX Lea no charge	
8.29.14	Participate in Hearing before Judge Ramos on Motioi to Determine	0.3
8.29.14	Review Josh Bone pro hac vice order (.1)	no charge
8.29.14	Review TX's objections to our exhibits	0.4
8.29.14	Review TX's designations of deposition excerpts	0.7
8.29.14	File our exhibits with the court (0.2)	no charge
8.29.14	File Josh Bone pro hac motion (0.1)	no charge
9.1.14	Prepare Cong. Marc Veasey for trial testimony	2.8
9.1.14	Meet with witnesses to review testimony	5.2
9.2.14	Trial prep. & Meeting of co-counsel re: opening statement and exhibits & handling objections	1.5
9.2.14	Attend and participate First day of Trial	8.8
9.2.14	Witness prep for experts Wood and Herron, & Benja	4.3
9.3.14	Attend and participate Second day of trial	8.4
9.3.14	Witness Prep for experts Barreto and Cornish	4.9
9.4.14	Attend and participate Third day of trial	8.7
9.4.14	Witness prep. Sen. Ellis, Rep. Hernandez-Luna, Mr.Ga	2.1
9.4.14	Meet with Dr. Lichtman to prep/review his trial testi	5.4
9.5.14	Meet with Dr. Lichtman to prep/review his trial testi	1.8
9.5.14	Attend and participate Fourth day of trial	8.8
9.7.24	Witness prep for expert Korbel	1.9
9.8.14	Attend and participate Fifth day of trial	8.4
9.9.14	Attend and participate Sixth day of trial (today we re	8.6
9.10.14	Attend and participate Seventh day of trial	8.5
9.11.14	Attend & participate Eighth day of trial (today TX res	4.1

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
9.12.14	Review Advisory filed by TX	0.1
9.15.14	Prepare motion for co-counsel to withdraw (Simson)	0.1
9.15.14	Review motion for E. Simson to withdraw (0.1)	no charge
9.15.14	Review Order granting E.Simson withdrawal (0.1)	no charge
9.15.14	TC w/Veasey -LULAC legal team re: Findings of Fact/(	0.7
9.16.14	Review Expert Reports of Dr. Ansolabehere/Webster	0.2
9.17.14	Review Expert Report of Dr. Bazelon	0.1
9.17.14	Review supplemental exhibit list filed by TX	0.1
9.17.14	Review Joint Filing of Final Exhibit List and Our Objections to State of TX exhibits (0.4)	no charge
9.17.14	Review Proposed Findings of Fact and Conclusions of Law to be filed jointly by all private plaintiffs (2.1)	no charge
9.18.14	Review Proposed Findings of Fact and Conclusions of Law to be filed jointly by all private plaintiffs (0.9)	no charge
9.18.14	Review Expert Report of Dr. Hood filed by TX	0.2
9.18.14	Review TX's 11th supplemental exhibit list (filed)	0.1
9.18.14	Review U.S. Objections to Defendnats' 11th exhibit li	0.2
9.20.14	Review 2nd supplemental report of Dr. Hood filed by	0.1
9.21.14	Prep for Closing Arguments and Exhibit Arguments	1.6
9.22.14	Attend and participate in 9th day of trial (closing arguments & exhibits arguments)	3.4
9.22.14	Review Errata to Findings of Fact filed by TX League of Young Voters (0.1)	no charge
9.23.14	Review Errata to Findings of Fact filed by TX Defenda	0.1
9.30.14	Review Draft Memo on Opposing Stay Pending Appe	0.4
10.9.14	Review Judgment, Order and Opinion of Judge Ramo	1.7
10.10.14	Review TX's Advisory to Court	0.1
10.10.14	Review State of TX emergency motion for stay	0.9
10.10.14	Prepare Response to TX's Advisory	0.2
10.10.14	File Response to TX's Advisory (0.1)	no charge
10.11.14	Review TX's Advisory re: November 2014 elections	0.1
10.11.14	Review TX's Notice of Appeal	0.1
10.11.14	Review/Write Stay Opposition	2.1
10.12.14	Review/Write Stay Opposition	1.5
10.12.14	Review Opp. to stay draft by TX League Young (0.6)	no charge
10.12.14	Review Opp. to stay draft by Taylor Respondents (0.5)	no charge
10.12.14	Review Opp. to stay draft by MALC/NAACP (0.6)	no charge
10.12.14	Review Opp. to stay draft by U.S. (0.7)	no charge
10.14.14	TC w/Veasey Legal Team re: 5th circuit decision gran	0.5
10.14.14	Review and Draft SCOTUS motion to vacate stay	4.5
10.14.14	Review 5th circuit order granting stay	0.2
10.14.14	Review and final edits to SCOTUS motion to vacate st	2.5
10.14.14	Communications to Danny Bickell at SCOTUS re: filing tomorrow with Circuit Justice Scalia	0.1
10.15.14	TCs with SCOTUS clerk's office re: filing revised app. (no charge	
10.15.14	Communication from Danny Bickell (SCOTUS) that Justice	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	Scalia has directed TX to respond by 5pm tomorrow	0.1
10.20.14	Prepare motion to hold attys fees motion in abeyanc	0.3
11.18.14	Meet with co-counsel to discuss appeal strategy/motion to expedite appeal	1.2
11.24.14	Review/edit Josh's draft motion to expedite appeal	0.7
11.25.14	Review/edit Josh's draft motion to expedite appeal	0.4
12.3.14	TC w/Veasey-LULAC legal team re: appeal coordinati	0.7
12.23.14	Veasey call to discuss appeal and expediting/oral argument, outline of district court decision for use in appellate l	1.5
<b><u>2015</u></b>		
1.7.15	Meet w/co-counsel to discuss research needed for filing motion to recover expert witness costs	
1.28.15	Read TX's appellate brief	2
1.29.15	TC w/Veasey-LULAC Legal Team to discuss TX's arguments in 5th circuit brief	0.5
1.30.15	TCs w/all plaintiffs to discuss 5th circuit merits brief	0.4
2.2.15	Meet w/co-counsel to discuss research needed for brief on the issue of racially discriminatory purpose/result	2.2
2.9.15	Discuss brief argument draft w/Josh Bone and agree on revisions	1.5
2.23.15	Review and edit merits brief in 5th circuit	2.9
2.24.15	Review 5th circuit order re: sealing document	0.1
2.25.15	Review 5th circuit order re: unsealing ROA docs	0.1
2.25.15	Communications w/M. Posner re: review draft brief (no charge	
2.25.15	Review comments from DOJ on our draft brief (0.2) no charge	
2.25.15	Make edits/comments to draft brief in light of DOJ c	0.3
2.26.15	Review comments from M. Posner re: review draft b no charge	
2.26.15	Make additional edits/comments on draft brief (0.5) no charge	
2.27.15	Comms. w/Veasey-LULAC team re: shorten brief (0.3 no charge	
2.27.15	TC w/DOJ to discuss disparate impact numbers in our brief (0.4) no charge	
2.27.15	Comms. w/Veasey-LULAC team re: edits to brief (0.9 no charge	
3.1.15	Review & make final edits to merits brief in 5th circu	0.9
3.2.15	Communication w/DOJ atty re: whether to address leg. privilege (Flynn) in our briefs	0.1
3.3.15	Communications w/AARP counsel seeking consent for filing an amicus curiae brief in 5th circuit	0.1
3.4.15	TC & comms. w/all plaintiffs counsel re: TX's request for more time to file their reply brief	0.5
3.4.15	Edit response to TX's motion for extension to file reply brief in 5th circuit brief	0.1
4.3.15	Communications w/other plaintiffs' counsel about who should argue in 5th circuit and length of argument	1.1
4.6.15	TC w/all plaintiffs' counsel (incl. DOJ) re: oral argument in 5th circuit	0.5
4.7.15	Communications w/co-counsel re: moot court locations	

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
	& times for Chad's moot courts & oralists	0.4
4.7.15	Communication w/DOJ counsel re: splitting argumen	0.1
4.8.15	TC w/co-counsel to discuss oral argument presentati	1
4.9.15	Review 5th circuit transmittal letter (re: supplemena	0.1
4.14.15	Review possible oral aguemnt questions submitted by other plaintiffs' co-counsel & discuss w/Dunn & Bone no charge	
4.15.15	Brainstorming session of all counsel to discuss arguments to be made in 5th circuit & strategies & emphasis (4.	2
4.20.15	Review 5th circuit panel draw & discuss w/Dunn (0.4 no charge	
4.22.15	Prepare for and attend moot court at US DOJ (3.5) no charge	
4.23.15	Travel to NYC on train w/C.Dunn moot court prep (3. no charge	
4.24.15	Prep work and moot court in NYC and follow-up (4.5 no charge	
4.28.15	Attend 5th cir. oral argument (2.0) no charge	
4.29.15	Communications to clients with link to audio of 5th circuit argument	0.3
5.28.15	Review motion of Danielle Conley to withdraw (0.1) no charge	
5.29.15	Review Order granting motion to withdraw (Conley)( no charge	
5.29.15	Calls and prep and follow-up re: Texas 28j letter	1.5
5.29.15	Review draft response to TX 28j letter (0.4) no charge	
6.1.15	Review & edit response to Texas 28j letter (0.6) no charge	
7.9.15	Draft Josh Bone motion to withdraw as counsel	0.2
7.10.15	Review Order granting Josh Bone motion to withdraw	0.1
8.5.15	Review 5th circuit panel decision	0.7
8.5.15	Communications w/Veasey-LULAC team re: next steps (incl. possible rehearing by TX, remand activities to be unc	1.2
8.12.15	TCs w/all plaintiffs' counsel to discuss 5th circuit decision, possible rehearing by TX, DOJ discussions with TX re: remedy, (remand activities to be undertaken)(0.8)	0.6
8.20.15	Review U.S. motion to remand case to the trial court for purpose of imposing interim relief	0.2
8.20.15	TC with TX AG Attys re: meet and confer on motion to issue mandate forthwith	0.2
8.20.15	Review edits to motion to issue mandate forthwith sent to us by MALC, NAACP, LDF, Taylor plaintiffs	0.3
8.21.15	Confer with plaintiffs' counsel (Dunn, Rosenberg) re: setting up meeting with Texas AG attys to explore remedy (includes call to TX AG atty to see if they will meet w/all plaintiffs' counsel in Austin to explore remedy optior	0.4
8.22.15	Communications among counsel re: confidentiality of upcoming settlement conversations with TX (0.3) no charge	
8.25.15	Review listing of docs and protocols for meeting with TX AG office re: upcoming meeting with TX to discuss re	0.2
8.26.15	Telephone Conference w/ all plaintiffs' counsel (including DOJ) re: contours of possible interim remedy	0.7
8.27.15	TC w/Dunn and Derfner re: meeting with State AG at no charge	
8.28.15	Review State of TX En Banc Petition	0.8

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
8.28.15	Review State of TX motion to stay issuance of manda	0.2
8.28.15	Review State of TX opposition to motion to issue mandate forthwith	0.2
8.31.15	Review directive from 5th circuit requiring a response to TX's rehearing en banc petition by 9/10	0.1
8.31.15	TC w/Veasey-LULAC legal team re: preparing response to TX's rehearing en banc petition	0.5
9.1.15	Update on status of DOJ expected 5th circuit filings from DOJ atty (0.2) no charge	
9.2.15	Tele Conf w/all plaintiffs' counsel (incl. DOJ) re: petition for rehearing en banc and arguments for opposition	0.5
9.2.15	Review motion to withdraw as counsel (Agraharkar)( no charge	
9.2.15	Review Order granting Vishal Agraharkar withdrawal no charge	
9.2.15	Prepare outline of a reply to the rehearing petition and the State's opposition to issue mandate forthwith for Veasey- LULAC Legal Team to consider	0.3
9.2.15	Communication w/co-counsel (Dunn) re: preparing a reply along the lines of my outline	0.2
9.2.15	Review Dunn draft of reply to TX's opposition to our motion to expedite issuance of the mandate (0.3) no charge	
9.2.15	Review Derfner edits to C. Dunn's draft reply (0.4) no charge	
9.2.15	Review 5th circuit order on various motions re: man	0.1
9.3.15	Final Review of reply to TX opposition re: motion to issue mandate forthwith (0.3) no charge	
9.3.15	Review motion to withdraw as counsel (Anna Baldwi no charge	
9.3.15	Review Order granting Baldwin withdrawal (0.1) no charge	
9.4.15	Review communications with 5th circuit clerk's office re: how we want our reply brief treated by the Court	0.2
9.4.15	Research into actions taken by certain 5th circuit judges re: votes on rehearings and rehearings en banc	0.4
9.5.15	Review Eagle Forum's motion (we oppose) to file am	0.2
9.8.15	Review DOJ draft opposition papers to TX's petition for rehearing en banc & motion to stay the mandate	0.5
9.9.15	Review our draft opposition to rehearing petition to ensure no inconsistencies w/DOJ's intended filing	0.2
9.9.15	TC w/all plaintiffs' counsel to discuss DOJ's draft response & additional points that need to be raised. Also discussed whether to join DOJ's filing or file separately	0.4
9.9.15	Review communication to DOJ w/suggestions for modifying their drafts to be filed tomorrow in 5th circuit (0.2) no charge	
9.9.15	Review edits by co-counsel (Derfner) to our opposition to TX's peition for rehearing (0.3) no charge	
9.10.15	Review communication from DOJ re: changes they will make or not make in light of our comments/suggestions	0.2
9.10.15	Review 5th circuit granting amicus curiae motion of Eagle Forum	0.1



<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
9.10.15	Review 2 DOJ filings: Final version of DOJ's filed response to petition for rehearing en banc & motion to stay	0.4
9.10.15	Final Review of Veasey-LULAC response in opposition to petition for rehearing en banc & motion to stay issuance of mandate (0.4) no charge	
9.12.15	Read Eagle Forum's amicus brief	0.5
11.24.15	Review motion to withdraw DOJ atty (E. Westfall)(0.1) no charge	
11.24.15	Review Order granting withdrawal (Westfall)(0.1) no charge	
<b>2016</b>		
1.10.16	Call w/DOJ to discuss what motion we can file in the 5th circuit to obtain interim relief for 2016	0.3
1.11.16	Communications with Veasey-LULAC legal team to discuss filing motion in 5th circuit & SCOTUS to obtain interim	0.6
1.12.16	TC w/ Veasey-LULAC legal team to discuss when we should file motion in 5th circuit & SCOTUS to obtain interim	0.3
3.7.16	NPR Interview re: Status of 5th circuit appeal (1.0) no charge	
3.9.16	Review 5th circuit order granting TX's rehearing petition	0.1
3.14.16	TC w/Veasey-LULAC team to discuss seeking emergency relief in SCOTUS	0.4
3.14.16	Comm. w/Veasey-LULAC team re: need for call (0.2) no charge	
3.17.16	Review & make edits to Emergency Motion to vacate	0.9
3.18.16	Final review & discussion w/Veasey-LULAC team re: filing of Emergency Motion, conferring with AG, & exhibits to	0.5
3.18.16	Filed motion to vacate in 5th cir. on behalf of Veasey-LULAC plaintiffs (0.1) no charge	
3.18.16	Receive and review communication from 5th circuit clerk re: just filed motion to vacate	0.1
3.18.16	Review 5th circuit directive carrying our motion to vacate with the appeal	0.1
3.19.16	Draft communication to Veasey-LULAC legal team re: effect of 5th circuit's directive & why we should proceed in	0.2
3.19.16	Communications with Veasey-LULAC legal team to discuss merits (pros/cons) of seeking relief in SCOTUS	0.4
3.20.16	Communications with Veasey-LULAC legal team to discuss seeking relief in SCOTUS--arguments to be made	0.3
3.21.16	TC w/Veasey-LULAC legal team re: SCOTUS filing, including arguments, structure of filing, timing	0.7
3.21.16	Consult with SCOTUS advocate Paul Smith re: seeking relief in Supreme Court	0.3
3.22.16	Review notice from 5th Cir. that rehearing argument is calendared for 5/24	0.1
3.22.16	Initial review of draft application to vacate stay to be filed in Supreme Court	0.5
3.22.16	Review N. Baron's edits to application to vacate stay no charge	
3.23.16	Additional review and edits to draft application to vacate stay in SCOTUS	1.4



<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
3.23.16	Review 2 sets of edits from A. Derfner to SCOTUS application to vacate stay (0.5)	no charge
3.23.16	Review edits from co-counsel (Lang) to SCOTUS application to vacate stay (0.4)	no charge
3.23.16	Communications with other plaintiffs' groups seeking and receiving comments on the Veasey-LULAC draft application to vacate stay in SCOTUS	0.8
3.23.16	Call to Danny Bickell at SCOTUS clerk office to advise that we will be filing our application this week	0.1
3.24.16	Review numerous communications w/Becker Gallagher re: printing/serving our SCOTUS application (0.4)	no charge
3.25.16	Review Executed certificate of service for SCOTUS fili	no charge
3.25.16	Final review SCOTUS application to vacate 5th circuit stay (1.1 hours)	no charge
3.25.16	Receive notice from SCOTUS clerk that application was received and providing docket #	0.1
3.28.16	Review TX's response to 5th cir. Motion for relief filed by Appellees Veasey-LULAC et al.	0.4
3.29.16	Receive notice from SCOTUS clerk when TX's response	0.1
3.29.16	Review Show Cause Order issued by 5th circuit (0.1)	no charge
3.29.16	Receive request from TX AG (M. Frederick) to extend time for TX to file supp. Brief (includes DOJ's opposition et	0.1
3.29.16	Review TX's motion to extend time to file supplemental brief in 5th cir.	0.3
3.30.16	Review U.S. opposition to TX's motion to extend time to file supplemental brief in 5th cir.	0.2
3.30.16	Review 5th cir. Order denying TX's motion for simultaneous briefing and granting in part motion for additional tir	0.1
4.4.16	Final review & edits: to 5th cir draft reply to TX's opp	0.2
4.4.16	File reply in 5th cir. to TX's opposition to our motion	no charge
4.5.16	Review communication from counsel for Fair Representation permission to file amicus brief on behalf of TX	0.1
4.5.16	Communications with other plaintiffs' counsel re: extensions for other plaintiffs-appellees to file supp. Brief (0.2)	no charge
4.7.16	TCs w/Veasey-LULAC legal Team re: assignments for briefing in 5th cir., timing, SCOTUS reply	0.5
4.11.16	Review State of TX Opposition to Vacate Fifth Circuit	1.3
4.11.16	Communication from SCOTUS clerk re: whether we intend to file a reply to TX's Opposition	0.1
4.11.16	Communications w/legal team about our response to SCOTUS clerk that we can file by this Thursday (4/14)	0.3
4.11.16	Draft outline of points to make in our SCOTUS reply	0.3
4.12.16	Draft SCOTUS reply arguments	0.7
4.12.16	Send my draft reply arguments to Veasey-LULAC tea	no charge
4.12.16	Communications w/counsel for Mountain States Legal Foundation seeking consent to file amicus	0.1

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
4.12.16	Tele. Conf. w/Veasey-LULAC legal team re: arguments to be made in SCOTUS reply memo/brief	0.5
4.12.16	Review message from C. Dunn re: call w/SCOTUS clerk no charge	
4.13.16	Communications w/Becker Gallagher re: serving our reply in SCOTUS (& their review of our filing for compliance w/ SCOTUS printing requirements/their prep tables of a	0.4
4.13.16	Review & edit SCOTUS reply to TX's Opposition	1.7
4.13.16	Final review and edits to SCOTUS reply	0.4
4.13.16	Serve SCOTUS reply on all counsel (0.1) no charge	
4.13.16	Communications w/Mara Silver at SCOTUS re: our filing cover (counsel of record)(0.1) no charge	
4.13.16	Make corrections to cover of reply brief/transmit same no charge	
4.16.16	Review State of TX's supplemental en banc brief	2.1
4.18.16	TC w/Veasey-LULAC legal team about who should do oral argument in 5th circuit en banc (1.0)	0.5
4.19.16	Communication to Mountain States Legal re: amicus	0.1
4.20.16	Review letter to 5th cir. Re: additional argument time no charge	
4.25.16	Review motion by certain States to participate amicus	0.1
4.25.16	Review motion to file en banc amicus brief (Eagle Forum)	0.1
4.26.16	Review 5th cir. Order denying additional argument time	0.1
4.26.16	Review communications about coordinating amicus briefs for our side (0.3) no charge	
4.28.16	Review communications re: coordinating amicus brief no charge	
4.29.16	Review SCOTUS Order denying stay but ordering expedited action & deadline in 5th Circuit & inviting us to refile	0.1
4.29.16	Review 5th cir. Order granting various amicus curiae	0.1
4.30.16	Review Derfner inserts for our en banc brief (0.3) no charge	
5.2.16	Review communication from 5th cir. Clerk re: arguing counsel (0.1) no charge	
5.2.16	Communication to other appellees' counsel re: oral argument in 5th circuit en banc (0.1) no charge	
5.2.16	Read comments by co-counsel regarding how amicus briefs supporting TX misstate voter fraud claims (0.2) no charge	
5.2.16	Review co-counsel (Dunn) edits to draft en banc brief no charge	
5.2.16	Review and edit Section 2 results section of en banc	0.4
5.6.16	Review letter filed in 5th circuit by Amicus Curiae Eagle Forum Fund (0.1) no charge	
5.6.16	Review and make edits to en banc brief	1.3
5.7.16	Review communications among arguing counsel to decide whether to do 15 minutes of uninterrupted argument time or to encourage questions from judges (0.3) no charge	
5.8.16	Review communications among arguing counsel to decide whether to do 15 minutes of uninterrupted argument time or to encourage questions from judges (0.2) no charge	
5.8.16	Review transcript of Veasey panel argument from 2015 and convey ideas to co-counsel Dunn	0.7

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
5.8.16	Review appearance form for Andrew Leblanc (0.1)	no charge
5.8.16	Comms. w/A. Derfner, C. Dunn, A. Kamin re: further edits to our en banc brief	0.3
5.8.16	Review Abbie Kamin's edits to our en banc brief	0.4
5.9.16	Comm. w/C.Dunn re: splitting of time w/Jania Nelson for oral arg. (7 or 8 minutes)	0.2
5.9.16	Review final version and edits of our en banc brief (1	no charge
5.10.16	Review MALC/NAACP Supplemental brief in 5th circuit	1.5
5.23.16	Review draft response & edits to be submitted by private plaintiffs to Rule 28j letter of TX appellants (0.2)	no charge
5.24.16	Oral argument today in en banc Fifth Circuit (unable to attend due to Whitford trial in Wisconsin)	no charge
7.20.16	Review Decision of En Banc Court	1.6
7.20.16	Review 5th cir. Orders on various motions	0.1
7.21.16	Review Order by Judge Ramos re: meet & confer (0.1	No charge
7.21.16	Review TX Advisory (0.2)	No charge
7.23.16	Review TX's Motion for entry of remedial order (0.2)	No charge
7.23.16	Review Order granting TX's motion for remedy (0.1)	No charge
7.25.16	Review Motion pro hac for Danielle Lang (0.2)	No charge
8.21.16	Review draft of Memo re: Intentional Discrim. claims	No charge
8.22.16	Review U.S. DOJ's Notice re: Discrim. Intent (0.2)	No charge
8.23.16	Review TX's response to Memos on Intent Briefing (C	No charge
9.6.16	Review U.S. motion to enforce temp. remedial order	No charge
9.6.16	Review draft of private plaintiffs' mot. re: remedial o	No charge
9.8.16	Review amended order re: deadlines and hearing (0.	No charge
9.12.16	Review TX's response in Opp. to motions for further	No charge
9.19.16	Participate in court hearing on motions to enforce (1	No charge
9.20.16	Review Order re: motion to enfordce remedial order	No charge
9.22.16	Review Advisory filed by TX AG (0.2)	No charge
11.18.16	Review Proposed FOF to be filed by all plaintiffs (1.0)	No charge
11.18.16	Review Plaintiffs' Brief re: Intentional Discrimination (	No charge
11.18.16	Review TX's proposed FOF and COL (0.5)	No charge
12.16.16	Review Plaintiffs' response to TX's FOF & COL (0.5)	No charge
12.16.16	Review TX's Response to Plaintiffs' Briefs (0.5)	No charge
12.16.16	Review TX's motion to seal TX's response (0.2)	No charge
1.20.17	TC w/C. Dunn re: hearing held today (0.2)	No charge
1.30.17	Review draft motion pro hac vice for Paul Smith (0.1	No charge
2.22.17	Review TX & U.S. motion to continue 2/28 hearing (C	No charge
2.22.17	Draft Opposition to TX & U.S. motion to postpone he	No charge
2.23.17	File Opposition for Veasey-LULAC plaintiffs (0.1)	No charge
2.24.17	Review Order from Judge Ramos denyting TX & U.S. motion to continue hearing on discrim. purpose (0.1)	No charge
2.28.17	Participate in court hearing on discriminatory intent	No charge
3.7.17	Review brief on impact of new ID legislation (0.9)	No charge
3.14.17	Review Veasey-LULAC supplemental brief (0.4)	No charge
3.14.17	Review TX's brief on impact of new ID legislation (0.5	No charge

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
3.15.17	Review Response of private plaintiffs to TX's 3/7 Adv	No charge
3.23.17	Review Order granting in part our motion to order payment of expert witness expenses (0.2)	No charge
3.29.17	Review TX's Advisory (0.1)	No charge
4.3.17	Review Order on U.S. Motion for voluntary dismissal	No charge
4.10.17	Review Order re: discriminatory purpose (0.4)	No charge
6.7.17	Participate in court hearing on remedies (0.7)	No charge
6.12.17	Review private plaintiffs' filing on briefing schedule (	No charge
6.28.17	Review TX's oposed motion re: 2nd interim remedy	No charge
7.5.17	Review Briefs filed by TX and Hisp. Judges re: remedi	No charge
7.5.17	Review private plaintiffs' brief re: remedies (0.3)	No charge
7.5.17	Review U.S. brief on remedies (0.2)	No charge
7.12.17	Review TX Advisory (0.1)	No charge
7.12.17	Review U.S. response to TX's motion re: 2nd interim	No charge
7.17.17	Review TX response brief on remedies (0.3)	No charge
7.17.17	Review private plaintiffs' brief re: proper remedies (C	No charge
7.19.17	Review private plaintifffs' opposition to TX's motion to issue 2nd interim remedy (0.5)	No charge
7.20.17	Review Supplemental brief of private plaintiffs (0.3)	No charge
7.20.17	Review TRX's Notice Withdrawing motion re: 2nd interim Remedy (0.2)	No charge
7.21.17	Review private plaintiffs' Advisory (0.2)	No charge
7.24.17	Review U.S. Advisory (0.2)	No charge
7.26.17	Review private plaintiffs' opp. response to TX's motion to reconsider discriminatory purpose order (0.3)	No charge
8.16.17	Review private plaintiffs' Advisory & TX Advisory Res	No charge
8.23.17	Review Order granting Section 2 remedies (0.2)	No charge
8.24.17	Review TX's motion to stay pending appeal (0.2)	No charge
8.25.17	Review TX's Advisory (0.2)	No charge
8.26.17	Review private plaintiffs' response to Advisory re: upcoming elections (0.2)	No charge
8.28.17	Review TX's reply to Advisory re: upcoming elections	No charge
8.30.17	Review Order granting limited stay (0.1)	No charge
9.2.17	Review TX's Advisory (0.2)	No charge
9.5.17	Review 5th cir. Document re: stay (0.1)	No charge
9.5.17	Review Order entered by Judge Ramos re: TX Adviso	No charge
1.14.19	Litigation team call re: attorneys fee motion (0.4)	No charge
1.14.19	Call attorneys fees motion (0.4)	No charge
1.28.19	Call re attorneys fees motion (0.5)	No charge
1.28.19	Call re attorneys fees motion (0.5)	No charge
1.29.19	Call re attorneys fees motion (1.0)	No charge
2.5.19	Call re attorneys fees motion (0.5)	No charge
2.13.19	Call re attorneys fees motion (0.2)	No charge
3.12.19	Call re attorneys fees motion (0.9)	No charge
3.13.19	Call re attorneys fees motion (0.3)	No charge
3.14.19	Call re attorneys fees motion (0.5)	No charge

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>
3.19.19	Call re attorneys fees motion (0.8)	No charge
4.9.19	Review brief in support of attorneys fees (0.5)	No charge
4.10.19	TC w/other plaintiffs' counsel re: fee motion (0.4)	<u>No charge</u>
<b>TOTAL BILLED HOURS</b>		<b>473.4</b>
		\$613/hour
		\$290,194.20

<b>Daniel Lang Description</b>	<b>Date</b>	<b>Time</b>	<b>Billing Judgment</b>
Research on available vehicles for Supreme Court relief for 2016 election and email to team on that research	1/11/2016	1.9	No charge
Call with Veasey counsel re: seeking Supreme Court relief	1/12/2016	0.3	No charge
Drafting renewed motion to expedite issuance of the	1/29/2016	2.5	No charge
Call with litigation team re: seeking relief for 2016 election	2/9/2016	1.4	No charge
Researching case law on average timeline for decision in	2/16/2016	0.1	No charge
Call with client	2/26/2016	0.2	
Drafting emergency motion to expedite issuance of the	3/3/2016	1.9	No charge
Drafting emergency motion to expedite issuance of the	3/3/2016	1.2	No charge
Drafting emergency motion to expedite issuance of the	3/3/2016	1.2	No charge
Drafting emergency motion to expedite issuance of the	3/7/2016	0.5	No charge
Call with A. Derfner re emergency motion	3/7/2016	0.2	No charge
Calls with litigation team members re: 5th Circuit briefing	3/10/2016	2.0	No charge
Calls with litigation team members re: 5th Circuit briefing	3/10/2016	1.1	No charge
Call with Veasey co-counsel re: motion to vacate stay	3/15/2016	0.5	
Draft of motion to vacate stay	3/15/2016	3.3	
Veasey co-counsel call re: draft motion to vacate stay	3/16/2016	0.7	
Draft of motion to vacate stay	3/17/2016	0.8	
Draft of motion to vacate stay	3/17/2016	1.2	
Final edits and formatting of motion to vacate stay	3/18/2016	1.0	
Call with co-counsel re: emergency SCOTUS motion to vacate	3/21/2016	1.0	
Draft of emergency SCOTUS motion to vacate stay	3/22/2016	4.0	
Draft of emergency SCOTUS motion to vacate stay	3/22/2016	1.0	
Draft of emergency SCOTUS motion to vacate stay	3/22/2016	1.8	
Draft of emergency SCOTUS motion to vacate stay	3/23/2016	4.2	
Draft of emergency SCOTUS motion to vacate stay	3/23/2016	1.5	
Draft of emergency SCOTUS motion to vacate stay	3/24/2016	1.1	
Draft of emergency SCOTUS motion to vacate stay	3/24/2016	2.6	
Final edits to emergency SCOTUS motion to vacate stay (including tables, formatting, and printing specifications)	3/24/2016	6.2	
SCOTUS emergency application in-person delivery	3/25/2016	1.4	
Draft of reply in support of 5th circuit emergency motion to	4/3/2016	2.5	
Draft of reply in support of 5th circuit emergency motion to	4/4/2016	0.1	
Draft of reply in support of 5th circuit emergency motion to	4/4/2016	0.7	
Draft of reply in support of 5th circuit emergency motion to	4/4/2016	0.5	
Filing of reply in support of 5th circuit emergency motion to	4/4/2016	0.7	
Draft of SCOTUS reply in support of emergency motion to	4/12/2016	11.0	
Reading Texas' en banc brief	4/16/2016	0.5	
Call with litigation team re: en banc briefing	4/18/2016	1.0	No charge
Call with LDF re: en banc briefing	4/18/2016	1.0	
En banc brief outline	4/19/2016	1.5	
En banc brief outline	4/19/2016	3.0	
Drafting en banc brief	4/26/2016	1.5	
Drafting en banc brief	4/26/2016	8.5	
Calls with litigation team re: en banc briefing	4/27/2016	0.7	No charge
Drafting en banc brief	4/27/2016	2.1	

<b>Daniel Lang Description</b>	<b>Date</b>	<b>Time</b>	<b>Billing Judgment</b>
Drafting en banc brief	4/27/2016	3.9	
Drafting en banc brief	4/27/2016	3.0	
Call with litigation team re: en banc briefing	4/28/2016	1.0	No charge
Call with A. Derfner re: en banc brief	4/28/2016	0.5	
Drafting en banc brief	4/28/2016	0.7	
Calls with litigation team re: en banc briefing	4/29/2016	1.5	No charge
Drafting en banc brief	4/29/2016	1.5	
Drafting en banc brief	4/30/2016	7.0	
Drafting en banc brief	5/1/2016	11.0	
Call with A. Derfner re: en banc brief	5/2/2016	0.5	
Call with litigation team re: en banc briefing	5/3/2016	0.2	No charge
Call with litigation team re: en banc briefing	5/3/2016	0.4	No charge
Call with A. Derfner re: en banc brief	5/3/2016	0.2	
Drafting en banc brief	5/3/2016	7.2	
Drafting en banc brief	5/3/2016	0.5	
Call with litigation team re: en banc briefing	5/4/2016	0.4	No charge
Drafting en banc brief	5/4/2016	6.0	
Drafting en banc brief	5/4/2016	1.4	
Reading filed en banc briefs from plaintiff groups	5/9/2016	1.0	No charge
Drafting en banc brief	5/9/2016	10.2	
Reading filed en banc briefs from plaintiff groups	5/10/2016	0.4	No charge
Reading filed en banc briefs from amicus	5/13/2016	0.4	No charge
Listening to oral argument	6/1/2016	0.9	No charge
Calls with litigation team re: 28j letter	6/1/2016	1.2	No charge
Draft of 28j letter	6/1/2016	1.5	
Filing 28j letter	6/1/2016	0.3	
Drafting petition for Supreme Court on stay	7/6/2016	0.2	No charge
Drafting petition for Supreme Court on stay (1.9)	7/6/2016	1.0	Reduced time
Call with J. Amunson re: potential SCOTUS application	7/7/2016	0.5	No charge
Call with litigation team re: potential SCOTUS application	7/8/2016	0.5	No charge
Drafting petition for Supreme Court on stay (1.0)	7/8/2016	0.5	Reduced time
Call with litigation team re: potential SCOTUS application	7/11/2016	0.6	Reduced time
Drafting petition for Supreme Court on stay (1.0)	7/14/2016	0.5	Reduced time
Call with litigation team re: potential SCOTUS application	7/18/2016	0.4	No charge
Call with litigation team re: potential SCOTUS application	7/18/2016	0.2	No charge
Drafting petition for Supreme Court on stay (0.9)	7/18/2016	0.4	Reduced time
Drafting petition for Supreme Court on stay (1.0)	7/20/2016	0.5	Reduced time
Drafting petition for Supreme Court on stay (1.0)	7/20/2016	0.5	Reduced time
Reviewing 5th circuit en banc opinion and drafting motion to	7/20/2016	3.5	
Call with litigation team re: remedies	7/21/2016	0.5	No charge
Call with litigation team re: remedies	7/21/2016	1.0	No charge
Call with litigation team re: remedies	7/21/2016	1.7	No charge
Drafting motion on appropriate remedy	7/21/2016	0.5	
Negotiations re: appropriate remedy (including internal calls, discussions with opposing counsel, and drafts/edits of	7/22/2016	12.0	
Call with litigation team re: remedy schedule	7/25/2016	1.0	No charge



<b>Daniel Lang Description</b>	<b>Date</b>	<b>Time</b>	<b>Billing Judgment</b>
Call with opposing counsel re: remedy negotiations	7/25/2016	0.5	No charge
Call with litigation team re: remedies	7/25/2016	0.2	No charge
ECF registration and pro hac vice motion at district court	7/25/2016	1.0	
Draft of motion to expedite the interim remedy schedule	7/25/2016	1.5	
Litigation team call re: remedy negotiations	7/26/2016	1.0	No charge
Finalizing expedited motion re: interim remedy schedule	7/26/2016	0.3	
Litigation team call re: remedy negotiations	7/27/2016	0.5	No charge
Litigation team call re: remedy negotiations	7/28/2016	0.6	No charge
Litigation team call re: remedy negotiations	7/28/2016	1.3	No charge
Litigation team call re: remedy negotiations	7/28/2016	1.0	No charge
Edits to proposed joint order on remedy and call to discuss	8/1/2016	1.5	
Edits to proposed joint order on remedy and call to discuss	8/1/2016	0.6	
Call with litigation team re: proposed joint order	8/2/2016	1.0	No charge
Call with litigation team re: proposed joint order	8/2/2016	0.2	No charge
Review of opposing counsel edits to proposed joint order	8/2/2016	1.7	
Negotiations re: proposed joint order	8/2/2016	1.7	
Negotiations re: proposed joint order	8/2/2016	0.5	
Negotiations re: proposed joint order	8/2/2016	0.4	
Call with litigation team re: remedy	8/3/2016	0.3	No charge
Call with litigation team re: remedy	8/3/2016	0.2	No charge
Call with litigation team re: remedy	8/3/2016	1.0	No charge
Review of Texas' proposed "additional terms" to joint	8/3/2016	0.5	
Reviewing/editing draft response to "additional terms"	8/4/2016	1.1	
Litigation team call re: intent briefing and schedule	8/9/2016	0.8	No charge
Hearing before Judge Ramos	8/10/2016	1.2	No charge
Litigation team call re: interim remedy materials review and	8/10/2016	0.5	No charge
Litigation team call re: interim remedy materials review and	8/10/2016	1.0	No charge
Review of SOS documents for interim remedy and proposed	8/10/2016	1.2	
Review of SOS documents for interim remedy and proposed	8/11/2016	0.5	
Hearing before Judge Ramos	8/12/2016	1.2	No charge
Litigation team call re: intent briefing	8/17/2016	0.5	No charge
Litigation team call re: interim remedy compliance	8/26/2016	0.2	No charge
Litigation team call re: interim remedy compliance	8/26/2016	0.5	No charge
Litigation team call re: interim remedy compliance	8/29/2016	0.8	No charge
Litigation team call re: interim remedy compliance	8/30/2016	0.7	No charge
Litigation team call re: interim remedy compliance	9/6/2016	0.5	No charge
Litigation team call re: interim remedy compliance	9/16/2016	0.6	No charge
Court call with Judge Ramos	9/19/2016	1.3	No charge
Call with private plaintiffs and DOJ re: intent pfofs	9/19/2016	0.3	No charge
Call with litigation team re: intent pfofs	9/19/2016	0.3	No charge
Call with litigation team re: intent pfofs	9/19/2016	0.5	No charge
Reviewing Texas cert petition	9/23/2016	0.4	
Reviewing Texas cert petition	9/26/2016	0.8	
Litigation team call re: Texas cert petition	9/28/2016	0.7	No charge
Call from Texas voter re: misinformation from SOS	9/28/2016	0.4	
Monitoring compliance of materials with consent decree	9/28/2016	0.3	



Daniel Lang Description	Date	Time	Billing Judgment
Monitoring compliance of materials with consent decree	10/4/2016	0.1	
Call with litigation team re: opposition to cert petition	10/5/2016	0.6	No charge
Call with litigation team re: opposition to cert petition	10/6/2016	0.4	No charge
Call with litigation team re: opposition to cert petition	10/6/2016	0.6	No charge
Call w. A. Derfner re: intent briefing	10/11/2016	0.5	No charge
Review of tarrant county and election committee hearing	10/13/2016	0.2	
Call w. A. Derfner re: intent pfofs	10/14/2016	0.1	No charge
Call w. A. Derfner re: intent pfofs	10/14/2016	0.8	No charge
Drafting and editing pfofs	10/18/2016	0.5	No charge
Drafting and editing pfofs	10/18/2016	1.5	No charge
Drafting and editing pfofs	10/20/2016	1.2	No charge
Drafting and editing pfofs	10/20/2016	0.7	No charge
Drafting and editing pfofs	10/20/2016	0.7	No charge
Drafting and editing pfofs	10/20/2016	1.0	No charge
Drafting and editing pfofs	10/20/2016	1.5	No charge
Call with D. Freeman (DOJ) re: pfofs	10/21/2016	0.1	No charge
Drafting opp cert	11/19/2016	2.5	
Drafting opp cert	11/20/2016	0.6	
Drafting opp cert	11/20/2016	0.4	
Drafting opp cert	11/21/2016	0.7	
Call with litigation team re: opp cert	11/22/2016	0.3	
Edits to opp cert	11/22/2016	0.5	
Edits to opp cert	11/23/2016	2.1	
Edits to opp cert	11/26/2016	2.3	
Edits to opp cert (record cites)	11/28/2016	0.4	
Reviewing of defendants' fof/col	11/29/2016	1.2	No charge
Call re: intent reply	11/29/2016	0.2	No charge
Call re: intent reply	11/29/2016	0.4	No charge
Drafting intent reply brief	12/9/2016	1.0	No charge
Drafting intent reply brief	12/10/2016	1.7	No charge
Drafting intent reply brief	12/13/2016	1.6	No charge
Litigation team call	1/4/2017	0.5	No charge
Conference call w/ district court	1/20/2017	0.5	No charge
Drafting motion for protective order	1/23/2017	1.1	No charge
Drafting motion for protective order	1/23/2017	1.4	No charge
Reviewing scotus order denying cert	1/23/2017	0.4	
Reviewing scotus order denying cert	1/23/2017	0.7	
Research for opposition to Texas motion to dismiss	7/2/2018	0.2	
Research for opposition to Texas motion to dismiss	7/3/2018	0.8	
Call re opposition to motion to dismiss	7/10/2018	1.0	
Drafting opposition to TX motion to dismiss	7/23/2018	1.1	
Drafting opposition to TX motion to dismiss	7/23/2018	2.4	
Drafting opposition to TX motion to dismiss	7/24/2018	2.6	
Edits to motion to dismiss opposition	7/25/2018	0.4	
Call w E. Rosenberg re: motion to dismiss opposition	7/26/2018	0.3	
Edits to motion to dismiss opposition	8/1/2018	0.3	

<b>Daniel Lang Description</b>	<b>Date</b>	<b>Time</b>	<b>Billing Judgment</b>
Litigation team call re: attorneys fee motion	1/14/2019	0.4	No charge
Call attorneys fees motion	1/14/2019	0.4	No charge
Gathering 2015-2017 contemporaneous time records and exe	1/15/2019	0.4	No charge
Research for attorneys fees motion	1/23/2019	1.2	
Call re attorneys fees motion	1/28/2019	0.5	No charge
Call re attorneys fees motion	1/28/2019	0.5	No charge
Compiling contemporaneous time records and exercising billir	1/29/2019	2.9	No charge
Call re attorneys fees motion	1/29/2019	1	No charge
Call re attorneys fees motion	2/5/2019	0.5	No charge
Call re attorneys fees motion	2/13/2019	0.2	No charge
Emails to co-counsel re fee petition	2/13/2019	0.2	No charge
Call with C. Dunn re fee petition	2/13/2019	0.1	No charge
Call with E. Rosenberg re: fee petition	2/13/2019	0.2	No charge
Drafting and editing brief in support of attorneys fees	3/11/2019	2.8	
Call re attorneys fees motion	3/12/2019	0.9	No charge
Call re attorneys fees motion	3/13/2019	0.3	
Drafting and editing brief in support of attorneys fees	3/13/2019	2.5	
Call re attorneys fees motion	3/14/2019	0.5	No charge
Call re attorneys fees motion	3/19/2019	0.8	No charge
Call re attorneys fees motion	3/27/2019	0.2	No charge
Edits to brief in support of attorneys fees	4/1/2019	0.8	
Call re attorneys fees motion	4/4/2019	0.3	No charge
Edits to brief in support of attorneys fees	4/8/2019	1.7	

Total Hours	254.5
Total Unbilled	48.5
Total Billed Hc	206.0
Rate	\$351/hour
Total Invoice	\$72,306.0

<b>J. Bone Description</b>	<b>Date</b>	<b>Time</b>	<b>Billing Judgment</b>
Working on pre-trial FOF/COL	8/18/2014	1.2	
Attending depositions and meetings	8/19/2014	7.4	No charge
Attending deposition	8/20/2014	4.5	No charge
Document review	8/20/2014	3	
Attending deposition and document review	8/21/2014	6.3	No charge
Attending deposition	8/22/2014	4.20	No charge
Document review	8/25/2014	7.5	
Document review	8/26/2014	6.1	
Objections to Texas exhibits	8/26/2014	2.7	
Deposition Designations	8/27/2014	2.7	
Document review	8/27/2014	4	
Veasey team call and prep and follow-up	8/27/2014	1.9	No charge
Document review	8/28/2014	2.2	
Work on license surrender issue	8/28/2014	0.5	
Work on chart comparing state photo voter ID laws	8/28/2014	1	
Objections to Texas exhibits: call with G. Hebert	8/28/2014	0.2	
Veasey team call and prep and follow-up	8/28/2014	1	No charge
Work on exhibits for trial	8/29/2014	2.1	
Objections to Texas exhibits	8/29/2014	1.5	
Work on license surrender issue	8/29/2014	0.4	
Work on amendments charts	9/2/2014	5.5	
Research on expert testimony objections	9/4/2014	2.8	
Legal research on standing for plaintiffs	9/5/2014	3.1	
Reading trial transcripts	9/10/2014	4.6	No charge
Preliminary research on as applied challenges	9/10/2014	1.9	
Further research on as applied challenges	9/11/2014	3.9	
Further research on as applied challenges	9/12/2014	2	
Reading trial transcripts	9/12/2014	3.5	No charge
Reviewing Seventh Circuit oral argument	9/12/2014	1	No charge
Veasey team call and prep and follow-up	9/15/2014	0.7	No charge
File E. Simson Motion to Withdraw	9/15/2014	0.2	
Researching and drafting remedy proposal	9/15/2014	2.3	
Work on updating FOFs to reflect trial testimony	9/16/2014	2.3	
Drafting additions to COL	9/16/2014	0.2	
Work on COL	9/16/2014	1.4	
Work on COL	9/17/2014	14	
Work on COL	9/18/2014	7	
Veasey team call and prep and follow-up	9/18/2014	0.7	No charge
Veasey team call and prep and follow-up	9/19/2014	2	No charge
Closing argument preparation	9/19/2014	6.4	
Call with A. Derfner and follow up	9/20/2014	0.6	
Legal research	9/21/2014	3.3	
Closing argument preparation	9/21/2014	5.5	
Attending closing arguments	9/22/2014	4	No charge
Stay pending appeal research/writing (4.5)	9/26/2014	2.2	Reduced time
Stay pending appeal call/research/writing	9/30/2014	0.9	No charge

<b>J. Bone Description</b>	<b>Date</b>	<b>Time</b>	<b>Billing Judgment</b>
Research and writing re: stay and appeal (5.8)	10/1/2014	2.9	Reduced time
Legal research re: stay and appeal	10/1/2014	0.6	
Call and follow up re: implementation of SB 14	10/2/2014	1.2	
Work on draft stay response (4.5)	10/6/2014	2.2	Reduced time
Work on template for stay fact finding	10/6/2014	2.2	No charge
Work on draft stay response (6.7)	10/7/2014	3.3	Reduced time
Work on template for stay fact finding	10/7/2014	2	No charge
Work on draft stay response (3.9)	10/8/2014	2	Reduced time
Work on draft stay response (3.5)	10/9/2014	2	Reduced time
Reviewing district court opinion	10/9/2014	1	
Call, drafting, and filing response to Texas advisory	10/10/2014	6.2	
Call, drafting, research on stay response (12.4)	10/11/2014	6	Reduced time
Call, drafting, research on stay response (8.4)	10/12/2014	4.4	Reduced time
Work on Supreme Court brief (14.8)	10/14/2014	7	Reduced time
Work on Supreme Court brief (5.5)	10/15/2014	2	Reduced time
Call re: reply, research, writing reply, filing (2.1)	10/16/2014	1	Reduced time
Work on remedy issue (bail in)	10/21/2014	1.3	No charge
Work on remedy issue (bail in)	10/24/2011	0.7	No charge
Work on remedy issue (bail in)	10/27/2014	1.3	No charge
Work on reimbursement issue	10/31/2014	4	
Compiling documents for A. Derfner	11/12/2014	0.2	No charge
Work on motion to expedite	11/18/2014	4.7	
Work on motion to expedite	11/19/2014	2.7	
Work on motion to expedite	11/24/2014	6.3	
Work on motion to expedite	11/25/2014	1	
Veasey team call re: coordination	12/3/2014	0.7	No charge
Work on reimbursement issue	12/4/2014	1.9	
Reading for fact section of brief	12/22/2014	3.2	
Veasey call and district court opinion outline	12/23/2014	1.5	No charge
Work on expert witness cost motion	1/7/2015	0.3	
Work on expert witness cost motion/order	1/16/2015	0.7	
Work on expert witness cost motion/order	1/22/2015	1.2	
Work on expert witness cost motion/order	1/23/2015	0.3	
Work on section of appellate brief fact section	1/23/2015	4	
Work on section of appellate brief fact section	1/26/2015	6.5	
Read Texas's appellate brief	1/28/2015	2.2	
Veasey team call	1/29/2015	0.5	No charge
Work on ROA key	1/29/2015	1.2	
All Plaintiff call	1/30/2015	0.9	No charge
Work on ROA key	1/30/2015	5.1	
Research on purpose argument	2/2/2015	3.2	
Drafting appellate brief section	2/3/2015	6.7	
Drafting appellate brief section	2/4/2015	6	
Drafting appellate brief section	2/5/2015	2.8	
Drafting appellate brief section	2/6/2015	4.2	
Drafting appellate brief section	2/9/2015	3.3	

<b>J. Bone Description</b>	<b>Date</b>	<b>Time</b>	<b>Billing Judgment</b>
Revision of appellate brief sections	2/10/2015	1.8	
Copying record on appeal	2/11/2015	1	No charge
Review of draft section of appellate brief	2/11/2015	0.8	
Revising draft section of appellate brief	2/12/2015	2	
Conference call and follow up	2/13/2015	0.8	No charge
Revising draft section of appellate brief	2/17/2015	7.2	
Compose and edit motion for expert reimbursement	2/18/2015	3.5	
Revising draft sections of appellate brief	2/18/2015	1.2	
Revise motion for expert reimbursement	2/19/2015	2.2	
Revise appellate brief	2/20/2015	8.1	
Revise appellate brief	2/23/2015	6.5	
Additional legal and factual research	2/23/2015	4.4	No charge
Conversation with expert M. Herron	2/24/2015	0.4	
Brief revision	2/24/2015	6.9	
Record citations	2/25/2015	8.7	
Brief revision	2/26/2015	4.7	
Brief revision	2/27/2015	10.2	
Brief revision	2/28/2015	4	
Brief revision	3/1/2015	3.2	
Brief revision	3/2/2015	6	
Final brief revision	3/3/2015	4.2	
Motion to extend reply deadline	3/4/2015	2.8	
Work on as applied remedy issue	3/9/2015	2.2	
Factual research	3/9/2015	0.7	
Factual research	3/13/2015	0.4	
Call on oral argument	3/18/2015	1	No charge
Call on oral argument	3/31/2015	1.2	No charge
Call on oral argument	4/1/2015	2.2	No charge
Research/email drafting re: oral argument	4/3/2015	1	
Call on oral argument	4/3/2015	1.1	No charge
Reply to A. Derfner email	4/5/2015	0.6	
Oral Argument Call	4/8/2015	1	No charge
Reply to A. Derfner email	4/9/2015	0.9	
Draft oral argument question responses	4/14/2015	6.2	
Meeting at Wilmer Hale re oral argument	4/15/2015	4.5	
Organizational work related to oral argument; brain:	4/20/2015	1.3	
Prep work and meeting with C. Dunn and A. Derfner	4/21/2015	2.1	
Prep work and moot court at DOJ	4/22/2015	3.5	No charge
Draft email to E. Rosenberg	4/23/2015	0.4	
Prep work and moot court in NYC and follow-up	4/24/2015	3.2	No charge
Attend oral argument	4/25/2015	2	No charge
Calls and prep and follow-up re: Texas 28j letter	5/29/2015	1.5	
Draft 28j response	5/29/2015	1	
Call with Armand and follow-up re: Texas 28j letter	5/31/2015	0.3	
Revise response to Texas 28j letter	6/1/2015	4.5	

**J. Bone Description**

<b>Date</b>	<b>Time</b>	<b>Billing Judgment</b>
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Total Hours	400.4	
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Total Unbilled Hou	75.4	
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Total Billed Hours	325.0	
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Rate	\$307/hour	
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Total Invoice	\$99,775.00	
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Emma Simson Description	Date	Hours	Billing Judgment
Call w/ DOJ and co-counsel re: consolidation, scheduling, discovery	9/10/2013	1.0	No charge
Call w/ co-counsel re: scheduling, discovery	9/13/2013	1.0	No charge
Call w/ DOJ re: scheduling, discovery	9/16/2013	1.0	No charge
Call w/ DOJ, co-counsel re: scheduling	9/17/2013	1.0	No charge
Call w/ Texas re: scheduling, discovery	9/18/2013	1.0	No charge
Call w/ plaintiffs' counsel re: scheduling, discovery	9/20/2013	1.0	No charge
Call w/ DOJ re: scheduling, discovery	9/20/2013	1.0	No charge
Call w/ co-counsel re: research/litigation strategy	9/25/2013	0.5	No charge
Call with experts Barretto & Smith about potential research methods/work in the case	9/27/2013	1.0	
Researching litigation holds generally and in 5th Circuit; Drafting litigation hold letter to state	10/2/2013		No charge
Researching TTV and modifying litigation hold letter for	10/7/2013		No charge
Call w/ co-counsel re: expert cost estimates, etc.	10/7/2013	1.5	No charge
Call re: info collected by election officials; PIs	10/8/2013	1.0	
Call w/ co-counsel re: info from election official on info collected	10/8/2013	0.3	No charge
Call w/ experts re: cost estimates, etc.	10/9/2013	1.0	
Call w/ co-counsel to discuss decisions about experts cost estimates	10/9/2013	0.5	No charge
Incorporating edits to litigation hold letter to TTV	10/10/2013	0.3	
Call w/ DOJ re: scheduling	10/18/2013	0.5	No charge
Call w/ co-counsel re: schedule, experts, fact discovery	10/21/2013	0.6	No charge
Prepare for interview with witness (draft questions, research)	10/23/2013	0.5	
Interview witness	10/25/2013	0.3	
Legal research on standing	10/25/2013	2.5	
Draft declaration	10/25/2013	0.2	
Call w/ co-counsel re: strategy	10/28/2013	0.2	No charge
Call w/ all parties on ESI, 26(f) issues	10/28/2013	0.3	No charge
Drafting letter on trial schedule	10/28/2013	4.1	
Call w/ co-counsel, expert on database issues/e-discovery	10/30/2013	0.3	No charge
Call w/ co-counsel re: response to motion to dismiss	10/30/2013	0.4	No charge
Editing 26(f) report	10/31/2013	1.3	
Preparing 26(f) report (making edits to DOJ's version, Veasey insert, preparing Veasey proposed order, creating counsel list, etc.)	11/1/2013	5.1	
Call w/ co-counsel re: experts, facts, motion to dismiss issues	11/5/2013	1.0	No charge
Contacting clients	11/5/2013	0.3	
Preparing for witness interviews, interviewing potential witnesses, drafting declarations	11/5/2013	5.4	
Reviewing DOJ statement on schedule	11/5/2013	0.3	
Reading motion to dismiss; research on claims in TX MTD	11/6/2013	1.6	
Research on standing/MTD	11/7/2013	2.3	

<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Call w/ co-counsel to discuss experts, MTD	11/11/2013	1.5	No charge
Call w/ Sheila Korte; research re: other potential	11/12/2013	1.0	
Research on standing/MTD	11/13/2013		No charge
Call w/ co-counsel re: experts; witnesses; call follow-up	11/14/2013	1.0	No charge
Research on standing/MTD	11/14/2013	2.5	
Research on standing/MTD	11/15/2013	0.5	
Hearing with Court	11/15/2013	0.9	No charge
Debrief with co-counsel re: next steps on discovery; MTD	11/15/2013	0.6	No charge
Locating witnesses; interviewing witnesses; drafting			
declarations	11/15/2013	3.1	
Call w/ County Commissioner Ortiz re: issues in Nueces	11/15/2013	0.3	
Witness interview	11/15/2013	0.2	
Drafting witness declarations; researching additional			
MTD claims	11/15/2013	1.3	
Drafting witness declaration	11/16/2013	0.6	
Compiling information for 26(a) initial disclosures	11/18/2013	1.6	
Motion to dismiss response	11/18/2013	0.4	
Call w/ witness; clarifying declaration	11/18/2013	0.5	
Motion to dismiss response	11/18/2013	3.0	
Call w/ non-DOJ plaintiffs' counsel re: coordination	11/18/2013	1.2	No charge
Motion to dismiss response	11/18/2013	6.7	
Motion to dismiss response	11/19/2013	10.5	
Motion to dismiss response	11/20/2013	1.9	
Drafting response to Defendants' advisory on trial	11/20/2013	2.5	
Motion to dismiss response	11/20/2013	4.2	
Motion to dismiss response	11/20/2013	8.2	
Motion to dismiss response	11/21/2013	14.5	
Call w/ co-counsel re: hearing with court: re schedule	11/22/2013	0.5	No charge
Motion to dismiss response	11/22/2013	2.5	
Call w/ court re: TX advisory on schedule	11/22/2013	0.6	No charge
Call w/ co-counsel to debrief call w/ court on schedule,			
determine next steps	11/22/2013	0.4	No charge
Identify potential plaintiffs for Teresa to interview	11/22/2013	0.8	No charge
Motion to dismiss response	11/22/2013	1.7	
Researching potential new claims (right to travel)	11/25/2013	1.7	
Amending complaint, researching potential voter issues	11/25/2013	5.1	
Interviewing witness	11/25/2013	0.2	
Amending complaint, researching potential voter issues	11/25/2013	0.9	
Amending complaint, researching potential voter issues;			
contacting witnesses	11/26/2013	8.7	
Call w/ Veasey counsel re: amending complaint, experts	12/2/2013	0.6	No charge
Researching potential claims, plaintiffs	12/3/2013	1.6	
Call w/ Armand re: prospective plaintiffs	12/3/2013	0.6	
Call w/ Chad re: prospective plaintiffs	12/3/2013	0.2	
Call potential plaintiffs	12/3/2013	0.2	
Amending complaint	12/4/2013	4.0	



<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Call w/ co-counsel re: new plaintiffs, claims, amending complaint	12/4/2013	1.7	No charge
Follow-up from call w/ co-counsel (e.g. plaintiffs, complaints)	12/4/2013	0.4	
Amending complaint, final edits, etc.	12/6/2013	6.3	
Call w/ potential experts and other plaintiffs re: surveys	12/12/2013	1.0	No charge
Call w/ DOJ, plaintiffs re: federal database issues	12/17/2013	0.3	No charge
Call w/ plaintiffs' counsel re: deponents, other case developments	12/18/2013	0.6	No charge
Research for Texas Motion to Dismiss Second Complaint	1/6/2014	7.7	
Research for Texas Motion to Dismiss Second Complaint	1/7/2014	10.7	
Research for Texas Motion to Dismiss Second Complaint	1/8/2014	0.3	
Call w/ co-counsel re: status of case (experts, motions, discovery)	1/8/2014	0.8	No charge
Research for Texas Motion to Dismiss Second Complaint	1/8/2014	2.6	
Call w/ Armand re: due process claim	1/8/2014	0.8	
Research, drafting, etc. for Texas Motion to Dismiss Second Complaint	1/8/2014	4.8	
Research, drafting, etc. for Texas Motion to Dismiss Second Complaint	1/9/2014	1.9	
Research, drafting, etc. for Texas Motion to Dismiss Second Complaint	1/10/2014	4.8	
Call w/ Armand re: Reponse to TX Mot to Dismiss 2nd Complaint	1/10/2014	0.6	
Research, drafting, etc. for Texas Motion to Dismiss Second Complaint	1/10/2014	5.1	
Call w/ co-counsel re: experts, interrogatories	1/13/2014	0.3	No charge
Call w/ DOJ re: fact development	1/17/2014	0.4	No charge
Reviewing consent protective order, etc.	1/20/2014	0.8	
Call w/ co-counsel re: experts, discovery,	1/21/2014	1.2	No charge
Call w/ Matt Barreto re: database matching	1/22/2014	0.5	
Call w/ other plaintiffs re: experts, depositions, common	1/22/2014	0.9	No charge
Call w/ plaintiffs re: factual development	1/28/2014	1.5	
Call w/ Chad Dunn re: algorithms, survey	1/28/2014	0.4	
Call w/ Chad, Gerry, Matt Barreto re: algorithms	1/28/2014	0.3	No charge
Reviewing new draft consent protective order; drafting e-mail to counsel re: concerns	1/28/2014	0.8	
Meeting w/ Allan Lichtman re: expert reports	1/29/2014	1.0	
Gathering materials for Lichtman	1/29/2014	0.4	
Call w/ Armand and Chad re: consent protective order, algorithm	1/30/2014	1.0	
Checking earlier consent agreement's effect on future production of certain database info	1/30/2014	0.5	
Reviewing new draft consent order; drafting potential modifying language; call w/ Armand re: contents, etc.	1/31/2014	1.3	

Emma Simson Description	Date	Hours	Billing Judgment
Reading depositions from TX v. Holder case for info on DB info on citizenship proof	1/31/2014	0.5	
Call w/ DOJ re: database matching process	2/3/2014	0.8	No charge
Call w/ our experts re: database matching	2/3/2014	0.7	No charge
Reviewing new consent protective order; discussing with Armand	2/3/2014	0.3	
Reviewing database matching process, preparing concerns; discussing with Armand	2/3/2014	1.9	
Call w/ plaintiff groups re: depositions	2/4/2014	0.6	No charge
Call w/ Armand, Herron re: databases, algorithms	2/5/2014	1.2	
Making edits to deposition notices	2/5/2014	0.3	
Call w/ Veasey counsel re: trial schedule, discovery,	2/5/2014	1.1	No charge
Attempts to enter TX Database for Production documents	2/5/2014	0.6	No charge
Call w/ experts re: areas for reports, developments in case, etc.	2/6/2014	1.3	
Editing depos notices	2/6/2014	0.8	
Call w/ Veasey team to discuss additional expert areas	2/6/2014	1.3	No charge
Downloading, scanning, etc. docs from Production 3	2/6/2014	0.5	No charge
Call w/ M. Herron re: database matching in other states	2/6/2014	0.3	
Researching database matching in NC (criteria for 2013 matches)	2/6/2014	0.8	
Researching database matching in PA	2/6/2014	1.1	
Downloading documents from TX production; Reviewing documents in production	2/6/2014	1.8	
Call w/ Armand and Michael H. re: new algorithm, TX algorithm	2/7/2014	0.9	
Editing 30b6 depo notice for Public Safety Commission	2/9/2014	0.8	
Call w/ DOJ, Michael, Armand re: algorithm issues	2/10/2014	0.5	
Editing deposition notices for AG Office	2/10/2014	0.3	
Call w/ MB, Chad, Ezra's group re: survey	2/10/2014	0.2	
Drafting Veasey Proposed Order on Discovery for databases, separate orders for court	2/10/2014	1.8	
Drafting Veasey draft response to US proposed order on DB	2/10/2014	3.3	
Drafting alternative proposed entries (dividing up agreed, unagreed)	2/10/2014	0.9	
Reviewing and editing Veasey response, attached orders (e.g. paragraph 12)	2/11/2014	2.0	
Reviewing DOJ's motion, revising Veasey response, proposed orders, etc.	2/11/2014	1.5	
Preparing for status hearing (drafting summary of DB issues)	2/11/2014	0.3	
Call re: info collected by organizations re: 2013 elections	2/11/2014	0.3	No charge
Call w/ Veasey counsel re: status hearing on 2.12	2/11/2014	1.1	No charge
Reviewing US motion re: scheduling order	2/11/2014	0.4	

<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Researching Jones v. Deininger schedule	2/11/2014	1.0	
Hearing with Court	2/12/2014	0.8	No charge
Debrief with co-counsel re: hearing, next steps	2/12/2014	0.2	No charge
Call w/ DOJ re: schedule, attachment 3 of ECF 161	2/13/2014	0.6	No charge
Reviewing DOJ statement on attachment 3	2/13/2014	0.2	
Responding to Veasey counsel e-mails re: proposed order, schedule, hearing on 2/14/2014	2/13/2014	1.4	
Reviewing Texas response to Attachment 3 of ECF 161	2/13/2014	0.3	
Call w/ Veasey counsel re: hearing w/ court, attachment 3	2/14/2014	0.5	No charge
Hearing with Court re: attachment 3	2/14/2014	0.4	No charge
Call with Veasey counsel re: modifications to agreed order	2/14/2014	0.4	No charge
Call w/ other plaintiff counsel to discuss coordination	2/14/2014	0.3	No charge
Revising DOJ's algorithm for simplification	2/18/2014	6.3	
Creating charts for DOJ's algorithm; on phone with Armand re: charts	2/18/2014	1.1	
Revising charts, DOJ's algorithm document	2/19/2014	3.4	
Commenting on survey instrument	2/19/2014	0.4	
Revising DOJ's algorithm for simplification (call w/ Armand)	2/19/2014	0.8	
Call w/ Armand re: edits to DOJ's algorithm; revising algorithm	2/20/2014	1.8	
Call w/ Barreto and lawyers re: survey instrument	2/20/2014	2.1	
Call w/ other plaintiff groups to coordinate	2/20/2014	0.4	No charge
Call w/ Michael re: database algorithm terms	2/20/2014	0.2	
Reviewing motion to compel legislative documents	2/20/2014	0.8	
Reviewing plaintiffs' draft motion in support DOJ motion to compel	2/20/2014	1.3	
Researching motion to compel legislative docs	2/20/2014	0.5	
Preparing for witness interview	2/25/2014	0.4	
Reviewing docs and downloading production documents	2/25/2014	1.2	
Calling witness; composing e-mail	2/25/2014	0.2	
Call w/ Michael, Armand, Teresa, Ben re: databases	2/26/2014	0.7	
Call w/ Michael and Armand re: databases	2/26/2014	0.3	
Call w/ Teresa re: docs from Elections Department; typing up list of docs	2/26/2014	0.4	
Downloading production documents, skimming	2/26/2014	0.6	
Reviewing survey and providing comments, edits	2/27/2014	1.4	
Reviewing TX response to motion re: compel leg priv	2/27/2014	0.8	

<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Call w/ Barreto and lawyers re: survey instrument	2/27/2014	1.4	
Call w/ plaintiff groups re: DOJ meeting, depositions, trial schedu	2/27/2014	1.2	No charge
Call w/ Armand re: memo on proof of citizenship, databases, next steps	2/27/2014	0.4	
Call w/ Michael re: database algorithm from DOJ	2/28/2014	1.0	
Call w/ Armand re: DOJ meeting, database algorithm	2/28/2014	0.3	
Preparation for meeting with DOJ	2/28/2014	1.1	No charge
Meeting with DOJ and other plaintiff groups	2/28/2014	2.0	No charge
Reviewing new survey instrument	3/3/2014	0.6	
Phone w/ chad re: survey instrument (knowledge questions)	3/3/2014	0.2	
Composing list of algorithm issues for DOJ	3/3/2014	0.4	
Talk with Matt, Chad re: survey	3/3/2014	0.5	
Talk with group re: survey	3/3/2014	1.2	
Call with all parties (include Tx) re: algorithm	3/3/2014	0.4	
Hearing before court	3/5/2014	1.7	
Call w/ all plaintiffs counsel re: depositions, leg privilege	3/6/2014	0.8	No charge
Call w/ Veasey Counsel re: leg privilege issue	3/6/2014	0.8	No charge
Research on past cases, reading orders on leg privilege	3/11/2014	4.0	
Working on part I of response on legislative privilege	3/11/2014	4.2	
Redrafting response on leg privilege	3/12/2014	4.9	
Revising response on legislative privilege	3/12/2014	1.9	
Additional revisions to response on legislative privilege	3/13/2014	2.8	
Drafting subpoena and depo notice for Stan Stanart	3/13/2014	0.8	
Call w/ other plaintiffs groups re: depos, schedule, leg priv	3/13/2014	0.7	
Finalizing legislative privilege response	3/13/2014	2.5	
Call w/ Veasey counsel re: next steps for subpoenas, depos	3/14/2014	0.8	
Call w/ Luis Figueroa re: citizenship / DL bills	3/14/2014	0.9	
Call w/ Anna Baldwin re: algorithm	3/14/2014	0.1	
Drafting memo on call w/ Luis Figueroa	3/14/2014	0.6	
Reading filings from 3/14/2014	3/17/2014	1.0	
Reviewing documents for Stan Stanart, Department of Health	3/19/2014	3.0	
Call with all plaintiffs	3/20/2014	0.8	
Research on citizenship requirement for call w/ Rep. Burnham	3/25/2014	0.7	

<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Call w/ Rep. Burnham re: connections between citizenship proof requirement for DL and SB 14	3/25/2014	0.7	
Researching all bills dating back to 2005 re: citizenship	3/25/2014	5.1	
Reviewing TX RFPs on individual plaintiffs	3/25/2014	2.5	
Preparing potential objections to TX RFPs on individual plaintiffs	3/25/2014	8.2	
Preparing potential objections to TX RFPs on individual plaintiffs	3/26/2014	1.2	
Call with Veasey counsel re: depositions, schedule, etc.	3/26/2014	0.8	No charge
Preparing potential objections to TX RFPs on individual plaintiffs	3/26/2014	2.0	
Call w/ all plaintiffs counsel re: depositions, schedule, April 1 hearing	3/26/2014	0.7	No charge
Preparing potential objections to TX RFPs on individual plaintiffs; preparing e-mails to counsel re: objections	3/26/2014	0.7	
Reviewing documents re ALEC	3/31/2014	1.5	
Reviewing filings (amicus on House reps; TX letters re: subpoenas, etc.)	4/1/2014	1.5	
Hearing with Court	4/1/2014	1.5	No charge
Reviewing discovery objections and responses from TX; creating docs with overviews	4/1/2014	2.7	
Reviewing and drafting new interrogatories on outreach, citizenship	4/1/2014	0.3	
Call w/ Veasey counsel re: hearing w/ court on 4/1; next steps with discovery, trial schedule, etc.	4/2/2014	1.1	No charge
Document review re: Stan Stanart	4/2/2014	1.0	
Call w/ all private plaintiff counsel	4/3/2014	0.8	No charge
Document review re: Harris County	4/3/2014	3.6	
Document review re: radio, TV	4/4/2014	0.7	
Drafting interrogatories	4/4/2014	0.3	
Call w/ Damien Brockmann re past bills	4/4/2014	0.6	
Drafting interrogatories on citizenship requirements for DLs	4/4/2014	0.8	
Researching past bills related to DL provisions	4/4/2014	0.7	
Revising draft interrogatories, RFPs	4/7/2014	1.6	
Legislative research on past citizenship bills	4/7/2014	1.2	
Summary of proof of citizenship issue	4/7/2014	0.5	
Hearing with court on schedule	4/8/2014	0.5	No charge
Veasey counsel meeting re: causes of action, expert discovery, etc.	4/8/2014	6.8	
Veasey counsel meeting re: causes of action, expert discovery, etc.	4/8/2014	8.3	
Drafting e-mails to plaintiff's group re citizenship requirement issues	4/8/2014	0.3	

Emma Simson Description	Date	Hours	Billing Judgment
Composing plaintiff contacts	4/9/2014	0.3	No charge
Calling Diana Mutz re: case	4/9/2014	0.1	
Uploading discovery documents to dropbox	4/9/2014	0.3	No charge
Drafting e-mail to co-counsel on substantially similar name analysis	4/9/2014	0.3	
Call w/ Armand re: queing expert; attempt to reach queing expert	4/9/2014	0.3	
Document review on ALEC	4/9/2014	0.9	
Document review on Harless	4/9/2014	0.9	
All plaintiffs call	4/10/2014		No charge
Call w/ other plaintiffs re objections	4/11/2014	0.8	No charge
Talk with Dr. Shumsky; set up meeting	4/11/2014	0.1	
Records Request for Jasper County	4/11/2014	0.3	
Document Review on legislative docs	4/11/2014	1.4	
Document review on legislative docs	4/14/2014	1.2	
Call w/ Jennifer Maranzano; Anna Baldwin; search for data dictionaries; contacts with Crivella West	4/14/2014	0.3	
Call w/ Armand re: proof, interrogatories	4/14/2014	1.1	
Document review on legislative docs	4/14/2014	0.3	
Training on Crivella West document review	4/14/2014	1.0	
Document review for Harris County depositions	4/15/2014	3.4	
Call from Myrna re provisional ballots	4/15/2014	0.1	
Document review for Harris County depositions	4/15/2014	4.8	
Hearing with court	4/16/2014	0.3	No charge
Document review: Harris County	4/16/2014	2.3	
Reading Texas v. Holder expert reports on intent (Kousser)	4/16/2014	2.0	
Document review: Harris County	4/16/2014	4.3	
Call w/ Rob Shumsky	4/17/2014	0.7	
Document review on notice and education campaign	4/17/2014		
Call w/ plaintiff counsel re: depositions, experts, etc.	4/17/2014	1.0	No charge
Document review on provisional ballots	4/18/2014	1.0	
Revising RFPs, ROGs	4/18/2014	2.3	
Document review on substantially similar names	4/19/2014	8.8	
Call w/ Neil, Scott re: Ingram deposition	4/21/2014	0.3	
Call w/ Rob Shumsky	4/21/2014	0.3	
Call w/ Veasey Team re: experts, discovery, etc.	4/21/2014	0.2	No charge
Call w/ Scott, Neil re: deposition for Ingram	4/21/2014	0.5	
Call w/ Will, Herron TDP re: database matching	4/21/2014	0.3	
Call w/ Herron, Chad, Gerry	4/21/2014	0.3	
Document review, depo prep for Ingram	4/21/2014	5.8	
Document review, depo prep for Ingram	4/22/2014	3.7	
Document review, depo prep for Ingram	4/22/2014	0.6	
Call w/ Scott depo prep for Ingram	4/22/2014	0.3	
Document review, depo prep for Ingram	4/22/2014	0.1	

Emma Simson Description	Date	Hours	Billing Judgment
Call w/ Neil and Scott - depo prep for Ingram	4/22/2014	0.8	
Document review, depo prep for Ingram	4/22/2014	2.0	
Depo prep for Ingram	4/23/2014	0.6	
Ingram deposition	4/23/2014	1.2	
Ingram deposition	4/23/2014	7.8	
Call with Veasey team	4/24/2014	1.5	No charge
Document review: B-M	4/24/2014	1.0	
Document review: Joe Peters depo prep	4/25/2014	1.5	
Call with Armand re experts	4/25/2014	0.3	
Call with all plaintiffs	4/25/2014	1.0	No charge
Call with Michael Herron re: matching	4/25/2014	0.5	
Call with Michelle Yeary re: document review	4/25/2014	0.3	
Document review: Joe Peters depo prep	4/25/2014	0.5	
Call with Armand re matching, EIC requirements	4/25/2014	0.3	
Document review, depo prep for Peters	4/27/2014	0.8	
Document review, depo prep for Peters	4/27/2014	3.7	
Drafting and revising objections and responses to TX RFPs for LULAC	4/30/2014	7.8	
Drafting Veasey 2d set of RFPs	5/1/2014	2.9	
Call w/ all plaintiffs group	5/1/2014	0.8	No charge
Call w/ all plaintiffs including DOJ	5/1/2014	0.6	No charge
Document review: TKO, Rodriguez	5/1/2014	1.3	
Hearing with Court (telephone)	5/1/2014	0.8	No charge
Document review	5/2/2014		No charge
Document review committee call	5/2/2014	0.5	
Document review: Election Purposes Only EIC	5/2/2014	2.5	
Revising RFPs	5/2/2014	0.8	
Call w/ plaintiffs groups	5/8/2014	1.0	No charge
Call w/ DOJ and other plaintiffs	5/8/2014	0.7	No charge
Research suspended, revoked DLs	5/8/2014	1.3	
Research on TTV motion to expedite appeal	5/8/2014	6.0	
Research on common interest privilege issue	5/9/2014	0.8	
Identifying and locating documents TX clawing back	5/9/2014	1.9	
Call w/ Michael Herron	5/9/2014	0.8	
Research on TTV motion to expedite appeal	5/9/2014	3.0	
Drafting LULAC Responses and Objections to 2d RFP	5/10/2014	1.8	
Research common interest; Editing memo on common interest	5/11/2014	4.4	
Pre-call with all plaintiffs on TX meet and confer on discovery	5/12/2014	0.9	No charge
Call w/ Veasey team on experts, witnesses, depositions, discovery	5/12/2014	1.1	No charge
Meet and confer with TX on discovery issues	5/12/2014	1.7	No charge
Common interest research	5/12/2014	1.5	



Emma Simson Description	Date	Hours	Billing Judgment
Editing common interest memo	5/12/2014	0.3	
Drafting 3d ROGs, RFPs	5/13/2014	0.8	
Editing common interest memo	5/13/2014	2.0	
Research, drafting TTV motion to expedite, stay	5/13/2014	2.8	
Call re finding affected persons	5/13/2014	0.3	
Drafting response to TTV motion to expedite	5/13/2014	0.8	
Edits to response to TTV motion to expedite	5/14/2014	1.4	
Research on additional cases for opposition TTV motion expedite	5/14/2014	0.9	
Compiling information on affected persons	5/14/2014	4.0	
Opiela document set review	5/14/2014	1.4	
Hearing with court	5/15/2014	0.8	No charge
Research EIC costs	5/15/2014	0.3	
Document review, EICs, equipment	5/15/2014	3.0	
Drafting RFAs	5/15/2014	3.2	
Revising, editing TTV motion	5/15/2014	2.2	
Revising discovery requests, drafting discovery requests	5/16/2014	1.8	
Updating cites, etc. for TTV motion, final edits	5/16/2014	1.8	
Drafting, revising discovery requests	5/16/2014	2.8	
Drafting, revising, serving discovery requests	5/16/2014	1.6	
Call w/ Veasey team re: costs, next steps, trial plans, etc.	5/19/2014	2.3	No charge
Depo prep for Katherine Cesinger	5/19/2014	3.9	
Call w/ Armand, redrafting notes for depo prep Cesinger	5/19/2014	1.4	
Case management issue related to plaintiffs	5/20/2014	1.0	
Drafting Veasey list potential witnesses, stories	5/20/2014	1.0	
Research on production formatting	5/20/2014	0.5	
Interview Jim Denton	5/20/2014	0.3	
Deposition Katherine Cesinger	5/20/2014	3.2	
Deposition Katherine Cesinger	5/20/2014	0.2	
Edits to ROGs, RFPs	5/20/2014	1.9	
Call w/ D Whitley and Armand re RFPs	5/22/2014	0.4	
Call w/ Armand re: conference with State	5/22/2014	0.2	
Calls re: expert methodologies of other teams	5/22/2014	0.4	
Call w/ J Denton	5/22/2014	0.1	
Revising RFAs	5/22/2014	0.4	
Composing e-mail to D Whitley	5/22/2014	0.8	
Call w/ D Whitley	5/22/2014	0.5	
Drafting e-mail to D Whitley re timing productions	5/22/2014	0.3	
Call w/ all private plaintiffs	5/22/2014	1.0	No charge
Call w/ all plaintiffs including DOJ	5/22/2014	0.9	No charge
Conference w/ state re discovery	5/22/2014	1.3	
Revising Interrogatories	5/22/2014	0.7	
Call w/ Veasey team re experts	5/22/2014	0.5	No charge



<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Document review re: equipment, RFAs	5/22/2014	1.2	
Call w/ Herron re analyses	5/22/2014	0.4	
Editing RFAs	5/22/2014	1.2	
Call w/ Armand re: experts	5/22/2014	0.3	
Reviewing Rodriguez deposition transcript	5/22/2014	3.5	
Drafting, revising discovery requests	5/23/2014	2.8	
Responding to D Whitley re production	5/23/2014	0.2	
Calls re: issues with depositions, state discovery responses	5/23/2014	0.2	No charge
Drafting, revising discovery requests	5/23/2014	1.4	
Call w/ M Herron re: racial analysis	5/23/2014	0.7	
Call w/ Allan Lichtman	5/23/2014	1.0	
Drafting, revising discovery requests	5/23/2014	5.8	
Researching open records requests to DSHS, drafting open records request to DSHS	5/27/2014	1.0	
Call w/ M Herron re: data needs	5/27/2014	0.2	
Call to Natasha, E-mail to Lynn Eisenberg re: TEAM data	5/27/2014	0.4	
Call w/ M Posner re: racial analyses	5/27/2014	0.3	
Call w/ Armand re: TX position on TEAM data	5/27/2014	0.1	
Call w/ A Baldwin re TX position on TEAM data	5/27/2014	0.2	
Revising, drafting e-mail to court re emergency hearing	5/28/2014	0.5	
Call w/ Armand, Revising e-mail to court, discussing Data issue	5/28/2014	1.3	
Hearing w/ Court	5/28/2014	0.5	No charge
Call w/ State, plaintiffs re: TEAM data	5/28/2014	0.7	No charge
Call w/ Veasey team	5/28/2014	0.3	No charge
Drafting memoranda for Court on data issue for hearing	5/28/2014	1.1	
Reviewing past orders, preparing for court hearing	5/28/2014	1.6	
Revising and filing memoranda for Court on data issue for hearing	5/28/2014	0.8	
Call w/ private plaintiffs re: hearing	5/28/2014	0.2	No charge
Preparing for Court hearing	5/28/2014	0.5	
Hearing with Court on TEAM data	5/28/2014	0.7	No charge
Call w/ Neil re preparing amended disclosures	5/28/2014	0.3	
Doc production - verification	5/28/2014	0.1	
Revisions of proposed orders; circulating; responding to e-mails	5/28/2014	0.5	
Revising 26(f) disclosures	5/28/2014	0.7	
Call w/ Anna Baldwin re: proposed orders	5/28/2014	0.1	
Call w/ Armand re: proposed orders	5/28/2014	0.2	
Composing e-mail to Anna re: proposed changes	5/28/2014	0.3	
Calls w/ M. Posner, A. Derfner re: proposed orders	5/29/2014	0.3	
Finalizing open records request to DSHS	5/29/2014	0.2	

<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Call w/ M Herron re: outcome court hearing	5/29/2014	0.2	
Preparing e-mail to M Herron re: consent protective orders, etc.	5/29/2014	0.2	
Meeting w/ Ben re: legislative research	5/29/2014	0.4	
Call w/ private plaintiffs (weekly status)	5/29/2014	1.0	No charge
Call w/ all plaintiffs (including DOJ) (weekly status)	5/29/2014	0.5	No charge
E-mails re: Herron, retaining assistant	5/29/2014	0.2	
Figuring out sending data from DOJ	5/30/2014	1.1	
Compiling additional info for state	5/30/2014	0.8	
Call w/ Veasey team	5/30/2014	1.5	No charge
Follow-up from call w/ Team	5/30/2014	0.9	No charge
Call w/ D Whitley re plaintiff additional info	5/30/2014	0.2	
Call w/ M Herron re databases	5/31/2014	0.4	
Reviewing CI statement	6/1/2014	0.7	
Call w/ Ezra, Armand re CI statement	6/1/2014	0.8	
Call w/ Armand, Herron re: databases, algorithms	6/1/2014	0.7	
Reviewing, editing CI statement	6/1/2014	1.2	
Compiling legislative docs	6/2/2014	1.8	
Compiling legislative docs	6/2/2014	2.3	
Call re affected persons	6/2/2014	0.6	No charge
Compiling legislative docs	6/2/2014	0.7	
Call w M Herron	6/2/2014	0.4	
Dealing with plaintiff issues	6/3/2014	0.5	No charge
Compiling legislative docs	6/3/2014	1.9	
Call re Lichtman (Gerry, Armand, Ben)	6/3/2014	0.8	
Preparing for Veasey team call (agenda, outstanding issues)	6/3/2014	0.9	
Call w/ Veasey team	6/3/2014	1.6	No charge
Follow up from call	6/3/2014	0.4	No charge
Compiling legislative docs	6/3/2014	0.8	
Call w/ Neil and April	6/4/2014	0.5	
Compiling legislative docs	6/4/2014	0.5	
Dealing with plaintiff issues	6/4/2014	0.7	
Reviewing algorithm declarations, issues for Herron	6/4/2014	0.8	
Compiling legislative docs	6/4/2014	0.5	
Call w/ Avner Shapiro	6/4/2014	0.2	
Compiling legislative docs	6/4/2014	0.8	
Discovery matters	6/5/2014	0.5	
Drafting ORR for Travis, ORRs to other counties, etc on issues	6/5/2014	1.6	
Call w/ Ruoff re census analyses	6/5/2014	1.9	
Call w/ private plaintiffs	6/5/2014	0.9	No charge
Call w/ all plaintiffs	6/5/2014	0.7	No charge

Emma Simson Description	Date	Hours	Billing Judgment
Working on open records requests to counties, research on counties	6/5/2014	3.3	
Call w/ April re: witnesses	6/6/2014	0.2	
Discovery matters	6/6/2014	0.3	No charge
Follow-up re witnesses	6/6/2014	0.3	
Reviewing RFAs	6/6/2014	0.2	
Call re: RFAs	6/6/2014	1.0	No charge
Call w/ Lichtman	6/6/2014	0.9	
Compiling documents from Section 5 case	6/6/2014	1.7	No charge
Reviewing attorney documents	6/6/2014	0.3	No charge
Court hearing	6/6/2014	1.0	
Discovery matters	6/9/2014	0.6	
Drafting letter to D Whitley re discovery issues	6/9/2014	1.5	
Call w/ Armand re: edits, making edits to letter to D Whitley	6/9/2014	0.6	
Reviewing transcript from earlier individual plaintiff depo	6/9/2014	0.8	
Drafting, researching, sending open records requests to counties	6/9/2014	1.9	
Finalizing and preparing letter for Savini to send to Whitley	6/9/2014	0.3	
Emails to April re witnesses	6/10/2014	0.2	
Open records requests	6/10/2014	0.3	
Reviewing expert materials	6/10/2014	0.7	
Call w/ Armand	6/10/2014	0.2	
Call w/ Veasey team	6/10/2014	1.9	No charge
Meeting with Gerry Hebert	6/10/2014	0.3	
Call w/ Michael Herron	6/10/2014	0.3	
Open records requests	6/10/2014	0.3	
Call w/ Armand	6/10/2014	0.2	
Call w/ Armand re: discovery issues	6/10/2014	0.6	
Call w/ Armand and Ezra re: discovery issues	6/10/2014	0.4	
Call w/ Armand re: discovery issues	6/10/2014	0.2	
RFA responses - revising	6/11/2014	0.5	
Open records requests	6/11/2014	1.8	
Reviewing TX Motion on federal databases	6/11/2014	0.3	
Drafting response TX Motion on federal databases	6/11/2014	1.6	
Call w/ Michael Herron	6/11/2014	1.4	
Drafting response to TX motion on federal databases	6/11/2014	2.3	
Open records requests to counties	6/12/2014	2.0	
Revising response to TX motion on federal databases	6/12/2014	1.0	
Meeting with all plaintiffs	6/12/2014	3.0	No charge
Call w/ Herron	6/12/2014	0.3	
Call w/ Armand re databases	6/12/2014	0.3	

Emma Simson Description	Date	Hours	Billing Judgment
Call w/ Herron	6/12/2014	0.1	
Call w/ Armand re databases	6/12/2014	0.2	
Edits to TX motion on federal databases	6/13/2014		
Call w/ Ezra, Mark, Armand re: federal databases	6/13/2014	0.3	
Call w/ Armand	6/13/2014	0.2	
Call w/ April re: witnesses	6/13/2014	0.2	
Open records requests	6/13/2014	2.3	
Locating info for Allan	6/16/2014	0.8	
Call w/ Marc Veasey re depo	6/16/2014	0.8	
Open records requests to states	6/16/2014	0.3	
Call w/ Allan Lichtman	6/16/2014	0.2	
Feedback on Cornish	6/16/2014	0.3	
Reviewing documents received from county ORR	6/16/2014	1.3	
Reviewing filing on federal database	6/16/2014	0.3	
Call w/ Veasey team	6/16/2014	0.8	No charge
Open records requests to states	6/16/2014	0.9	
Call w/ Armand	6/16/2014	0.3	
Preparing and sending ORRs to states	6/16/2014	1.3	
Call w/ Herron	6/16/2014	0.5	
Reviewing documents received from county ORR	6/16/2014	0.5	
County depo prep - topics, substantially similar names	6/16/2014	2.3	
Dropping off docs for Allan in Bethesda	6/17/2014		No charge
Call w/ Michael Herron, Armand	6/17/2014	2.0	
Depo prep with Veasey	6/17/2014	1.3	
Call w/ Armand re next steps on databases, discovery	6/17/2014	0.2	
Call w/ John Ruoff re data needed on voting patterns	6/17/2014	0.1	
ORR to other states, other follow up e-mails	6/17/2014	2.2	
Compiling documents for Allan	6/18/2014	0.3	
Document review of MALC/NAACP ORR	6/18/2014	0.2	
ORR to Tarrant County	6/18/2014	0.3	
Researching provisional voters in Tarrant, Dallas	6/18/2014	0.8	
LULAC Depo prep	6/18/2014	0.7	
Call re Open Records Request	6/18/2014	0.1	
Document review: Birdwell	6/18/2014	1.5	
Hearing with the Court	6/18/2014	1.2	No charge
Document review: birdwell	6/18/2014	0.4	
Reviewing transcript from NAACP 30(b)(6)	6/18/2014	0.3	
Call w/ Michael Herron	6/18/2014	0.3	
Reviewing transcript from NAACP 30(b)(6)	6/18/2014	0.3	
Reviewing memo on past bills related to citizenship/registration	6/19/2014	0.3	
ORRs to states, talk to Anna Baldwin,	6/19/2014	0.4	
Call w/ Veasey team	6/19/2014	1.3	No charge

<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
ORR Kansas	6/19/2014	0.4	
Birdwell depo prep	6/19/2014	0.3	
Document review: Straus	6/19/2014	0.7	
Call w/ private plaintiffs	6/19/2014	1.0	No charge
Call w/ all plaintiffs (including DOJ)	6/19/2014	0.7	No charge
Call re affected persons	6/19/2014	1.7	
Call w/ Neil	6/19/2014	0.1	
Call w/ Armand	6/19/2014	0.1	
Document production	6/19/2014	0.8	
Work on database matching	6/19/2014	0.3	
Interrogatories - reviewing responses from Texas, e-mails re: responses	6/19/2014	0.4	
Veasey deposition	6/20/2014	3.4	
Discovery matters (calls with Armand, Anna, Vishal, April, witnesses, etc., document production issues, reviewing materials, etc.)	6/20/2014	7.0	
Working on reviewing expert reports, various calls with Armand, Anna, Herron, Gabe Sanchez, etc.	6/21/2014	5.8	
Working on reviewing expert reports (Cornish, Barreto); various calls re expert discovery with Armand, call with Gabe Sanchez re survey, call with Armand/Ezra/Mark re survey, call with Avner re: witnesses	6/22/2014	6.5	
Reviewing expert reports (Cornish), revising amended disclosures, coordinating witnesses, preparing documents for production, setting up call on witnesses/plaintiffs for all plaintiff groups, various calls with Armand re expert and fact discovery issues, various calls with Anna Baldwin, various calls with Michael Herron re database issues, call with April Martin re witnesses	6/23/2014	8.3	
Call w/ Gabe	6/23/2014	0.2	
Working on expert reports, compiling themes for witnesses/plaintiffs	6/23/2014	1.5	
Call re database matching	6/24/2014	0.8	
Expert report issues, including calls with various people (Chad, Armand, Herron, Anna Baldwin, Gabe, Matt), fact discovery issues (preparing documents for production, drafting responses to RFAs, preparing chart of witnesses/plaintiffs by themes, call re witnesses/plaintiffs with other groups), other case management issues	6/24/2014	8.3	
Call re survey	6/25/2014	0.9	

<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Revising responses to RFA responses, drafting proposal to state on interrogatories - getting feedback, calls re survey and databases, calls with Herron re report, reviewing Lichtman report	6/25/2014	13.0	
Reviewing expert reports, addressing discovery matters (amended disclosures, RFA responses, additional document productions, expert productions)	6/26/2014	9.0	
Reviewing expert reports	6/27/2014	14.8	
Finalizing plaintiff/witness chart by theme	6/30/2014	1.5	
Call w/ private plaintiffs	7/1/2014	0.8	No charge
Call w/ all plaintiffs	7/1/2014	0.7	No charge
Reviewing expert reports	7/1/2014	3.3	
Reviewing expert reports	7/2/2014	1.5	
Call w/ Veasey team	7/2/2014	1.5	No charge
Call w/ Armand re discovery	7/2/2014	0.5	
Case administration matters	7/2/2014	0.8	No charge
Reviewing order on motions to dismiss	7/2/2014	0.8	
Call w/ Veasey team on order on motions to dismiss	7/2/2014	0.8	No charge
Research on costs of obtaining ID; various case admin; reviewing depo transcripts of other plaintiffs	7/7/2014	3.4	
Discovery matters	7/7/2014	1.7	
Patrick depo prep; discovery matters	7/8/2014	2.8	
Call w/ private plaintiffs	7/8/2014	0.8	No charge
Call w/ all plaintiffs	7/8/2014	0.7	No charge
Patrick depo prep	7/8/2014	1.5	
Reviewing expert reports	7/8/2014	2.2	
Reviewing expert reports	7/9/2014	0.8	
Reviewing expert reports	7/9/2014	0.5	
Call w/ Veasey team	7/9/2014	1.2	No charge
Findings of fact/conclusions of law	7/10/2014	0.7	
Patrick depo prep	7/10/2014	1.3	
Research on legislative debates	7/10/2014	0.3	
Research on legislative debates	7/10/2014	1.5	
Calling affected persons	7/10/2014	0.5	
Research on legislative debates	7/10/2014	2.9	
Reviewing expert reports; drafting findings of fact for Herron report	7/11/2014	6.9	
Research on poll tax issue	7/14/2014	0.8	
Draft of motion to compel on interrogatories	7/14/2014	3.3	
Research on poll tax issue	7/14/2014	0.3	
Draft on motion to compel on interrogatories	7/14/2014	0.3	
Discovery matters re defs resp to interrogatories	7/14/2014	0.5	

Emma Simson Description	Date	Hours	Billing Judgment
Draft of motion to compel on interrogatories, research on poll tax	7/14/2014	2.3	
Call w/ DOJ, private plaintiffs re Texas motion on expert reports	7/15/2014	0.3	No charge
Call w/ all parties on Texas motion on expert reports deadline	7/15/2014	0.2	No charge
Call w/ all parties on Texas motion on expert reports deadline	7/16/2014		No charge
Call w/ Veasey team	7/18/2014		No charge
Editing motion to compel interrogatory responses	7/18/2014	1.8	
Findings of Fact for Lichtman	7/18/2014	2.1	
Findings of Fact for Lichtman	7/20/2014	1.8	
Findings of Fact for Lichtman	7/21/2014	2.9	
Reviewing Harris County deposition transcripts, creating outline	7/21/2014	6.4	
Reviewing documents produced by TX for Veasey RFPs	7/22/2014	0.8	
Document review, depo prep for county depositions	7/22/2014	2.7	
Reviewing Dallas County amicus motion	7/22/2014	0.3	No charge
Editing response on TX motion to compel interrogatories	7/22/2014	0.6	
Depo prep: Fraser	7/22/2014	2.5	
Discovery matters	7/22/2014	0.3	No charge
Depo prep: county depositions	7/22/2014	2.3	
Call w/ Armand re: DPS issues	7/22/2014	0.7	
Call w/ Veasey team re: DPS issues	7/22/2014	0.8	No charge
Reviewing Veasey filing on DPS 2.8 million record issue	7/23/2014	0.2	
Reviewing Rodriguez deposition	7/23/2014	2.5	
Findings of Fact for Buck Wood	7/23/2014	1.1	
Call w/ Veasey team	7/23/2014	0.5	No charge
Call w/ D Whitley re interrogatories	7/23/2014	0.1	
Call w/ Armand re interrogatories, call w/ Whitley	7/23/2014	0.3	
Call w/ Michael Herron re new database issues	7/23/2014	0.4	
Hearing with court	7/24/2014	1.3	No charge
County depositions, post-depo meeting with Chad	7/24/2014	7.5	
Carrier Depositions	7/25/2014	5.8	
Call w/ Veasey team	7/28/2014	0.8	No charge
Call w/ Armand, Scott re Williams depo	7/28/2014	0.5	
Discovery matters	7/28/2014	0.5	No charge
Depo prep: Senator Williams	7/28/2014	4.0	
Case administration matters	7/28/2014	1.6	No charge
Findings of fact for experts	7/28/2014	0.3	
Call w/ Armand, Michael Herron	7/29/2014	0.8	
Research on poll tax issue	7/29/2014	5.3	



<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Call w/ Anna re data production	7/29/2014	0.2	
Call w/ Herron	7/29/2014	0.3	
Call w/ Armand re data production issues	7/29/2014	0.4	
Call w/ Chad re data production issues, hearing	7/29/2014	0.3	
Research poll tax	7/29/2014	0.4	
Call w/ Armand, Anna re data production issues	7/29/2014	0.3	
Call w/ Herron	7/29/2014	0.2	
Depo prep, Deposition DPS (by telephone)	7/30/2014	3.3	
Hearing with Court	7/30/2014	0.3	No charge
Reviewing expert reports	7/31/2014	0.8	
Call w/ Veasey team	7/31/2014	1.3	No charge
Case management issues	7/31/2014	0.3	No charge
Reviewing expert reports	7/31/2014	0.9	
Call w/ Armand re claims	7/31/2014	0.5	
Research on Section 2 claims	7/31/2014	0.3	
Call w/ Armand re claims	7/31/2014	0.4	
Call w/ Armand re claims	7/31/2014	0.2	
Legal research on Crawford claim	8/1/2014	0.3	
Call w/ Marinda re affected persons	8/1/2014	0.3	
Legal research on Crawford claim	8/1/2014	2.3	
Call w/ Avner Shapiro re affected persons	8/1/2014	0.2	
Legal research on Crawford claim	8/1/2014	1.6	
Call w/ Armand re trial prep	8/1/2014	0.3	
Case administration matters, legal research (Crawford claim)	8/1/2014	3.3	No charge
Reviewing state expert reports	8/2/2014	2.2	
Reviewing state expert reports	8/3/2014	2.5	
Reviewing findings of fact 14th amendment claims; discussing with Armand	8/3/2014	2.2	
Reviewing findings of fact Crawford claims	8/3/2014	0.9	
Call w/ Armand re claims	8/3/2014	1.0	
Call w/ Neil re witnesses	8/4/2014	0.3	
Case administration matters	8/4/2014	0.3	No charge
Legal research related to FOF/COL	8/4/2014	4.3	
Reviewing Brickner depo transcript	8/4/2014	0.8	
Legal research related to FOF/COL	8/4/2014	1.3	
Call w/ Veasey team	8/4/2014	1.1	No charge
Research witnesses/plaintiffs	8/4/2014	0.6	
Meeting with Avner, Amy Rudd re affected persons	8/4/2014	3.2	
Research/drafting FOF/COL	8/5/2014	0.5	
Meeting with Armand re claims, facts, etc.	8/5/2014	2.8	
Meeting with all plaintiffs	8/5/2014	4.5	No charge
Meet and confer with TX on discovery issues	8/5/2014	0.9	No charge
Discussions re eligibility claims	8/6/2014	0.4	
Discovery matters	8/6/2014	0.3	No charge
Reviewing, editing Cornish FOF	8/6/2014	0.7	
Research re expert fees	8/6/2014	0.6	



Emma Simson Description	Date	Hours	Billing Judgment
Document review re education	8/6/2014	0.8	
Reviewing editing Cornish FOF	8/6/2014	0.8	
Meet and confer with TX on discovery issues	8/6/2014	0.5	
Call w/ Veasey team	8/6/2014	0.4	No charge
Status hearing with court	8/6/2014	0.9	No charge
Call w/ Veasey team	8/6/2014	0.7	No charge
Case administration matters	8/6/2014	0.3	No charge
Reviewing FOF/COL Section 5 case	8/6/2014	0.7	
Call w/ Herron	8/6/2014	0.4	
Case administration matters	8/6/2014	0.6	No charge
Legal research re Crawford claims	8/7/2014	2.5	
Call w/ Herron re new database issues	8/7/2014	0.5	
Drafting COL, legal research on claims, case administration matters (e.g. database issues)	8/7/2014	3.9	
Call w/ Herron re new database issues	8/7/2014	0.3	
Drafting COL	8/7/2014	1.3	
Drafting COL on Crawford, different eligibility requirements, discovery matters, meet and confer with state, etc.	8/8/2014	8.1	
Legal research, drafting COLs	8/9/2014	4.7	
Legal research, drafting COLs	8/10/2014	1.5	
Call w/ Armand re COLs	8/10/2014	0.8	
Legal research, drafting COLs	8/10/2014	0.5	
Call w/ Herron	8/10/2014	0.3	
Legal research, drafting COLs	8/10/2014	1.1	
Call w/ Herron	8/10/2014	0.2	
Legal research, drafting COLs	8/10/2014	2.9	
Call w/ Herron	8/10/2014	0.3	
Legal research, drafting COLs	8/10/2014	0.8	
Legal research, drafting COLs	8/10/2014	1.3	
Document review, drafting proposed order re Herron, research on other states' voter ID laws, legal research and drafting COL poll tax claim	8/11/2014	8.3	
Legal research, drafting COLs	8/12/2014	0.4	
Reviewing amended report for Herron	8/12/2014	1.3	
Call w/ Neil	8/12/2014	0.4	
Legal research, drafting COLs	8/12/2014	1.2	
Call w/ Armand	8/12/2014	0.3	
Legal research, drafting COLs (Substantial name)	8/12/2014	0.4	
Call w/ Michael Herron re updated report	8/12/2014	0.7	
Case administration matters	8/12/2014	0.2	No charge
Legal research, drafting COLs (Substantial name); case administration matters	8/12/2014	4.4	
Deposition designations, drafting FOFs, COL, status confer	8/14/2014	7.4	
Deposition designations; drafting FOFs, document review	8/14/2014	2.9	
Deposition designations; drafting, revising FOFs, research	8/15/2014	4.5	

<b>Emma Simson Description</b>	<b>Date</b>	<b>Hours</b>	<b>Billing Judgment</b>
Call w/ Veasey team	8/15/2014	0.6	No charge
Deposition designations; drafting, revising FOFs, research	8/15/2014	9.6	
Deposition designations; drafting, revising FOFs, research	8/16/2014	11.2	
Drafting, revising FOFs, call with all plaintiffs re FOFs	8/17/2014	7.0	
Revising FOFs, addressing expert analyses, document review	8/18/2014	1.5	
Call re affected persons	8/18/2014	2.0	
Revising FOFs, addressing expert analyses, document review	8/18/2014	8.2	
Revising FOFs, preparing deposition designations, preparing	8/18/2014	7.3	
Finalizing FOFs and deposition designations	8/19/2014	1.2	
Finalizing FOFs and deposition designations	8/19/2014	3.5	
Meeting with Michael Herron	8/19/2014	1.3	
Preparing exhibits, exhibit list, finalizing deposition designations	8/19/2014	5.9	
Case administration matters	8/19/2014	0.3	No charge
Case administration matters; reviewing defendants' proposed findings of fact and conclusions of law; objections to designations/exhibits; drafting stipulations	8/25/2014	8.6	
Trial prep	9/1/2014	8.0	
Trial/trial prep	9/2/2014	16.0	
Trial/trial prep	9/3/2014	14.0	
Trial/trial prep	9/4/2014	12.7	
Trial/trial prep	9/5/2014	10.8	
Trial prep	9/6/2014	1.1	
Trial prep	9/7/2014	11.5	
Trial/trial prep	9/8/2014	9.2	
Trial/trial prep	9/9/2014	11.8	
Trial/trial prep	9/10/2014	12.8	
Trial	9/11/2014	5.3	
Total Hours		1165.7	
Total Unbilled Hours		123.7	
Total Billed Hours		1042.0	
Rate		\$307/hour	
Total Invoice		\$319,884.8	

## **EXHIBIT C**

**Time Records of Attorney J. Gerald Hebert in State of**  
**Texas v. Holder, No. 12-128 (D.D.C.)**

<b><u>Date</u></b>	<b><u>Legal Services Rendered</u></b>	<b><u>Actual Time Expended</u></b>	<b><u>Time Charged (Hours/ Tenths)</u></b>
1/24/2012	Review Texas' motion to Convene Three-Judge Court	0.1	0.1
1/26/2012	Review Order granting Motion to Convene Three-Judge Court	0.1	0.1
1/28/2012	Review Texas' Complaint	0.5	0.5
1/29/2012	Communication w/co-counsel re: division of labor for drafting intervention papers to avoid duplication	0.2	0.2
2/1/2012	File MOTION to Intervene for Kennie et al.	0.1	no charge
2/9/2012	Participate in Telephone Conference with parties and Court	0.5	0.5
2/15/2012	Review U.S. RESPONSE to MOTION to Intervene of Kennie Intervenor	0.2	0.2
2/16/2012	Review Texas' Memorandum in opposition to Kennie Intervenor MOTION to Intervene	0.4	0.4
3/12/2012	Review Notice of Appearance by Maranzano for AG Holder	0.1	no charge
3/12/2012	Review Notice of Appearance by Westfall for AG Holder	0.1	no charge
3/12/2012	Review Motion to Intervene by TX NAACP and Mexican American Leg. Caucus	0.4	no charge
3/12/2012	Review TX's motion to file amended Complaint with exhibits	0.5	0.5
3/12/2012	Review AG's Notice of Section 5 Determination of TX photo	0.4	0.4
3/14/2012	Participate in Telephone Conference with Parties and court re: scheduling issues/deadlines	0.5	0.5
3/14/2012	Review order granting intervention to our clients (and granting TX leave to amend and setting forth deadlines for discovery and briefing schedule)	0.2	0.2
3/16/2012	Review motion to appear pro hac vice of Ezra Rosenberg	0.1	no charge
3/16/2012	Review order granting pro hac vice to Rosenberg	0.1	no charge
3/19/2012	Review Notice of Appearance for Freeman for Holder	0.1	no charge
3/19/2012	Review Motion to Intervene by TX League of Young Voters,	0.3	no charge
3/20/2012	Review notice of appearance by Gear for Defendant AG	0.1	no charge
3/20/2012	Review Notice of Appearance by John Payton	0.1	no charge
3/20/2012	Review AG's filed notice of proposed scheduling order	0.2	0.2
3/20/2012	Draft Notice of Appearance for Hebert	0.1	0.1
3/21/2012	File Hebert Notice of Appearance in ECF	0.1	no charge
3/21/2012	Review motion to appear Pro Hac Vice for attys Haygood, Korgaonkar and Aden	0.1	no charge
3/21/2012	Review status report filed by Defendant AG	0.2	0.2
3/21/2012	Review order setting telephone conference for 4/3	0.1	0.1
3/21/2012	Communication with Ezra Rosenberg regarding discovery proposal from State and serving as co-administrator	0.2	0.2
3/21/2012	Participate in telephone conference with court and parties re: pending issues	0.5	0.5
3/21/2012	Communications with Ezra Rosenberg	0.3	no charge
3/22/2012	E-mail to Chashawn White (US District Court) that Ezra Rosenberg and I will serve as co-administrators for Defendant	0.1	0.1
3/22/2012	Review Order granting Intervention to TX League of Young	0.1	0.1

3/22/2012	Review notice of Appearance for Frederick for State of TX	0.1	no charge
3/22/2012	Review notice of Appearance for Ashton for State of TX	0.1	no charge
3/22/2012	Review notice of ESI agreement filed by Defendant Holder	0.2	0.2
3/22/2012	Review motion to intervene by TX Legis. Black Caucus	0.3	no charge
3/22/2012	Review TX's motion for protective order with exhibits	0.3	0.3
3/22/2012	Communications with Ezra Rosenberg	0.2	no charge
3/23/2012	Review notice of appearance by Wendy Weiser	0.1	no charge
3/23/2012	Review notice of appearance by Ian Vandewalker	0.1	no charge
3/23/2012	Review notice of appearance by Myrna Perez	0.1	no charge
3/23/2012	Review Notice filed by AG Holder	0.1	0.1
3/23/2012	Review Notice of Filing by TX with attached affidavit of TX SOS Ingram	0.3	0.3
3/23/2012	Review motion to intervene and memo of SW Voter Registration Project and Mi Familia Vota Education fund et al.	0.4	no charge
3/23/2012	Review TX Memorandum in opposition to TX Leg. Black Caucus Motion to Intervene (with exhibits of Kennie	0.2	0.2
3/23/2012	Communications with Ezra Rosenberg	0.1	no charge
3/26/2012	Prepare, review, and edit agenda for call on March 27 with all Defendant Intervenors' counsel	0.4	no charge
3/26/2012	Communications with Ezra Rosenberg	0.2	no charge
3/27/2012	Review Scheduling order setting trial dates discovery deadlines and pretrial conference	0.2	0.2
3/27/2012	Review order granting pro hac vice status to Weiser, Perez and Vandewalker	0.1	no charge
3/27/2012	Participate in conference call with court and parties regarding disclosure of data base information and database fields	0.5	0.5
3/27/2012	Review Order entered on briefing of database issues.	0.1	0.1
3/27/2012	Review Defendant Holder's motion for Protective Order with	0.3	0.3
3/27/2012	Review Notice of appearances for O'Connor, Abudu and	0.2	no charge
3/27/2012	Review notice of appearance by Michelle Yeary	0.1	no charge
3/27/2012	Communications with Ezra Rosenberg regarding designation of teams to handle issues: Affirm discovery, document reviews, legal research/writings, defensive fact discovery,	1.0	no charge
3/28/2012	Review RULE 26a1 Statement by TX League Young Voters	0.1	no charge
3/28/2012	Review notice of death of John Payton	0.1	no charge
3/28/2012	Review reply by TX Legis. Black caucus to TX's oppoistion to the motion to intervene	0.2	no charge
3/28/2012	Make revisions to draft brief on legislative privilege (due 3/29)	0.5	0.5
3/28/2012	Review and edit Intervenors' consolidated Memorandum in opposition to Texas' motion for Protective Order	0.3	0.3
3/28/2012	Telephonic conference call with Court	0.3	0.3
3/28/2012	Communications with Ezra Rosenberg	0.5	no charge
3/29/2012	Review TX's notice of Confidential database information	0.2	0.2
3/29/2012	Review Answer to Complaint filed by Mexican American Leg Caucus to amended Complaint	0.2	no charge
3/29/2012	Review TX's Memo in Opp. To Holder's mot. for Protective Order with Kennie Intervenor exhibit	0.4	0.4

3/29/2012	Review notice of appearance by Bell-Platts on behalf of	0.1	no charge
3/29/2012	Review Holder's Memo in Opp. To State of TX motion for prot. order 03/29/2012)	0.3	0.3
3/29/2012	Review final draft of Intervenor's Memo in support of Holder's Motion for Protective Order, and in Opposition to TX's notice of confidential database information	0.5	no charge
3/29/2012	Revisie and edit Intervenor's memo in support of U. S. motion for Protective Order	0.2	0.2
3/29/2012	Review Texas' 20-page memo on protective order	1.1	no charge
3/29/2012	Communication with co-counsel (Dunn) and Mr. Rosenberg re: Eric Kennie and filing by State	1.0	no charge
3/29/2012	Review Defendant Holder's motion to file reply memo	0.1	0.1
3/29/2012	Communications with Ezra Rosenberg	0.5	no charge
3/30/2012	Review Order granting protective order to U.S. with confidentiality language	0.2	0.2
3/30/2012	Review Order setting oral argument during telephone conference for 4/3 on TX's motion for protective order	0.1	0.1
3/30/2012	Review Orders regarding turning over full social security #s to	0.2	0.2
3/30/2012	Participate in telephone conference with court and parties regarding production of database information	0.6	0.6
3/30/2012	Review 3/30 protective order	0.1	0.1
3/30/2012	Review order granting pro hac to O'Connor and Abudu	0.1	no charge
3/30/2012	Review order on U.S. Motion for Protective Order	0.1	0.1
3/30/2012	Communications with Ezra Rosenberg	0.3	no charge
4/1/2012	Review Correspondence to State Attorney (J. Mitchell) regarding confidentiality concerns	0.2	no charge
4/2/2012	Review Correspondence to State Attorney (J. Mitchell) regarding confidentiality concerns	0.1	no charge
4/2/2012	Review TX's reply to Holder's opposition to TX's motion for Protective Order with attachment	0.2	0.2
4/2/2012	Communications with Ezra Rosenberg	0.7	no charge
4/3/2012	Participate in telephone conf with 3-judge court on data base and discovery issues.	0.5	0.5
4/3/2012	Review motion for leave to file doc under seal by Texas	0.1	0.1
4/3/2012	Review TX filing of redacted document re: one of Kennie	0.2	0.2
4/3/2012	Review order re: discovery from TX legislators and briefing thereon and vacating earlier orders	0.4	0.4
4/3/2012	Discuss with Intervenor's counsel and co-counsel (C. Dunn) re: meet and confer, and regarding State's objections to Defendant Intervenor's Request for Production and	1.0	no charge
4/3/2012	Conference Call among Defendant Intervenor's to discuss experts and privilege hearings and discovery response	1.0	no charge
4/3/2012	Communications with Ezra Rosenberg	0.4	no charge
4/4/2012	Call with DOJ at 6 P.M. to discuss 4/10 submission	0.3	0.3
4/4/2012	Weekly Intervenor's Call to update status	1.0	no charge
4/4/2012	Review errata filed by TX as to Amended Complaint	0.1	0.1
4/4/2012	Review amended motion to intervene of TX Legis. Black	0.2	no charge
4/4/2012	Communications with Ezra Rosenberg	0.3	no charge



4/5/2012	Review letter to State as follow-up to meet and confer	0.2	no charge
4/5/2012	Review order sealing document attached to US mot for pro	0.1	0.1
4/5/2012	Review order denying motion for leave to file reply	0.1	no charge
4/5/2012	Review notice of Appearance by Dale Ho	0.1	no charge
4/5/2012	Review Gary Bledsoe's motion pro hac vice	0.1	no charge
4/5/2012	Communications with Ezra Rosenberg	0.1	no charge
4/6/2012	Communication and coordination with Ezra Rosenberg to present discovery dispute letters to Judge Collyer and join DOJ's request for conference with Court	0.4	no charge
4/9/2012	Communication with DOJ Counsel (Westfall) regarding call	0.1	0.1
4/9/2012	Discussions with co-counsel regarding pending request for call with Court to resolve direct discovery impasse	0.5	no charge
4/9/2012	Review Defendant Holder's answer to amended complaint	0.2	0.2
4/9/2012	Review order setting telephone conference re: discovery	0.1	0.1
4/9/2012	Communications with Ezra Rosenberg	0.2	no charge
4/10/2012	Review Draft Notice of 30b 6 depositions	0.2	no charge
4/10/2012	Review filing of Memo by Defendant AG Holder with numerous exhibits for discovery dispute	0.4	0.4
4/10/2012	Participate in telephone conference regarding TX failure to comply and discovery dispute	0.4	0.4
4/10/2012	Review Ezra draft communication enclosing Defendant Intervenor's discovery dispute letters	0.2	no charge
4/10/2012	Communications with Ezra Rosenberg	0.6	no charge
4/11/2012	Review Notice filed by State of TX re: producing legislative	0.2	0.2
4/11/2012	Review notice of appearance for Debo Adegbile	0.1	no charge
4/11/2012	Review notice of appearance for Jon Greenbaum	0.1	no charge
4/11/2012	Defendant Intervenor's call regarding status of tasks by teams	1.2	no charge
4/12/2012	Review Order requiring TX to produce data base fields	0.1	0.1
4/12/2012	Review Advisory filed by Intervenor's Mi Familia Vota Ed. Fund, et al. re: intervention	0.1	no charge
4/12/2012	Discovery of Full SSN#'s in database mistakenly sent by State AG to intervenors and discuss with co-counsel need to promptly inform State AG of their error	0.4	no charge
4/12/2012	Review correspondence with State re: State's mistake in sending data base with full SSN's.	0.2	no charge
4/12/2012	Communications with Rosenberg regarding status of all pending requests	0.5	no charge
4/12/2012	Further correspondence with State regarding SSN mistake	0.1	0.1
4/12/2012	Communications with Ezra Rosenberg	0.5	no charge
4/13/2012	Review Order granting interventions and requiring all Intervenor's to avoid duplication and directing appointment of	0.2	0.2
4/13/2012	Review answer to complaint filed by TX Leg. Black Caucus	0.2	no charge
4/13/2012	Review answer to amended complaint filed by TX Leg. Black	0.2	no charge
4/13/2012	Review corporate disclosures filed by TX Leg. Black Caucus	0.1	no charge
4/13/2012	Review answer to complaint filed by Intervenor's Mi Familia,	0.2	no charge
4/13/2012	Review corporate disclosures by Mi Familia et al. 04/13/2012)	0.1	no charge

4/13/2012	Review State of TX reply	0.3	0.3
4/13/2012	Discuss with Intervenor's counsel delays by State in producing information and resulting impact on schedule and prejudice to Intervenor's	0.5	no charge
4/13/2012	Call with DOJ attorney regarding schedule delays by State	0.3	0.3
4/13/2012	Communications with Ezra Rosenberg	0.9	no charge
4/15/2012	Initial Draft of Defendant Intervenor's Consolidated Motion to Postpone Trial or Clarify Trial Date and Schedule	0.7	0.7
4/15/2012	Draft communication to State AG regarding noncompliance with deadlines	0.2	0.2
4/15/2012	Communications with Ezra Rosenberg	0.1	no charge
4/16/2012	Communications with Rosenberg and Dunn regarding sending a communication to Court regarding State's deficiencies regarding discovery	0.4	no charge
4/16/2012	Draft Motion to postpone or clarify trial date and send to other Intervenor's	1.5	1.5
4/16/2012	Prepare for conference call with Court set for 4/16	0.3	0.3
4/16/2012	Conference call with Court regarding discovery issues	0.3	0.3
4/16/2012	Review & revise to Motion to Postpone or Clarify trial date	0.4	0.4
4/16/2012	Participate in telephone conf. with court and parties regarding data base and discovery disputes.	0.5	0.5
4/16/2012	Communications with Ezra Rosenberg	1.4	no charge
4/16/2012	Conf Call with Intervenor's counsel re: current status in light of discovery disputes and court's comments re: same	1.1	no charge
4/17/2012	Review order re: pro hac vice	0.1	no charge
4/17/2012	Review Notice of Discovery Disputes by Defendant Holder	0.2	0.2
4/17/2012	Review Order directing filings re: possible delay in trial date	0.1	0.1
4/17/2012	Participate in telephone Conf. with court and parties regarding data base and discovery disputes.	0.5	0.5
4/17/2012	Communication with DOJ Counsel (Westfall) regarding call	0.1	0.1
4/17/2012	Communication with Rosenberg regarding 30b(6) deposition results and DOJ's position on trial date	0.2	0.2
4/17/2012	Communications with Ezra Rosenberg	0.5	no charge
4/18/2012	Edits to Kennie Intervenor's Answer to TX's Amended	0.2	0.2
4/18/2012	Communications with Ezra Rosenberg	0.4	no charge
4/19/2012	Review Elsie Boddie's motion pro hac vice	0.1	no charge
4/19/2012	Communications with Ezra Rosenberg	0.1	no charge
4/20/2012	Review TX's Notice regarding subpoena	0.2	0.2
4/20/2012	Review order granting pro hac status to Boddie	0.1	no charge
4/20/2012	Review Order denying State of TX's motion for protective	0.2	0.2
4/20/2012	Communications with Ezra Rosenberg	0.5	no charge
4/21/2012	Communications with Ezra Rosenberg	0.1	no charge
4/22/2012	Review, revise and edit Intervenor's consolidated motion to Clarify Trial Schedule	0.5	0.5
4/23/2012	Review Douglas Faum's pro hac vice motion	0.1	no charge
4/23/2012	Review motion for Bledsoe's pro hac vice	0.1	no charge
4/23/2012	Review Defendant Holder's motion to clarify schedule with	0.4	0.4



4/23/2012	Communications with Ezra Rosenberg	0.2	no charge
4/24/2012	Review pro hac vice order for Flaum, de Leeuw, Harris, and	0.1	no charge
4/24/2012	Review TX's filing asserting legislative privilege	0.3	0.3
4/24/2012	Communications with Ezra Rosenberg	0.4	no charge
4/25/2012	Communication with state AG attys re: data bases and	0.3	no charge
4/25/2012	Review Tx's amended notice of leg. Privilege	0.1	0.1
4/25/2012	Review Notice of appearance for Arthur Spitzer	0.1	no charge
4/25/2012	Review Defendant Holder's motion to compel (privilege logs)	0.5	0.5
4/25/2012	Communications with Ezra Rosenberg	0.4	no charge
4/26/2012	Review Defendant holder's Notice of Federal Databases	0.2	0.2
4/26/2012	Communications with Ezra Rosenberg	0.9	no charge
4/27/2012	Conference call with Intervenor's counsel re: interrogatories and requests for production	0.8	no charge
4/27/2012	Review TX's response in opposition to Intervenor's and DOJ's motion to clarify trial schedule with exhibits	0.4	0.4
4/27/2012	Review of Appearance by Sweeten for State of TX	0.1	no charge
4/27/2012	Review TX's response to DOJ filing on federal databases	0.2	0.2
4/27/2012	Communications with Ezra Rosenberg	0.3	no charge
4/29/2012	Communications with Ezra Rosenberg	0.2	no charge
4/30/2012	Participate in Telephone Conference with court and parties on data base issues (handgun)	0.3	0.3
4/30/2012	Review order requiring TX to produce data fields for handgun	0.1	0.1
4/30/2012	Review State of TX's response in opp. to motion of Defendant Holder to compel the Production of Documents and Privilege Logs with exhibits.	0.6	0.6
4/30/2012	Communications with Ezra Rosenberg	0.1	no charge
5/1/2012	Review order setting status conference for 5/3.	0.2	0.2
5/1/2012	Review motion pro hac vice Amy Pedersen	0.1	no charge
5/1/2012	Conf. Call with Intervenor's counsel to discuss discovery disputes/status	1.2	no charge
5/1/2012	Review State of TX's Advisory on Database Production	0.2	0.2
5/1/2012	Communications with Ezra Rosenberg	0.9	no charge
5/2/2012	Conf. Call with DOJ atty and Ezra Rosenberg re: discovery disputes with State of TX	0.4	0.4
5/2/2012	Prepare for upcoming Status Hearing	1.1	1.1
5/2/2012	Communications with Ezra Rosenberg	0.9	no charge
5/3/2012	Review Order requiring TX to produce additional database	0.1	0.1
5/3/2012	Review Order granting Pedersen pro hac vice motion	0.1	no charge
5/3/2012	Review notice of ppearance by Risa Berkower for AG holder	0.1	no charge
5/3/2012	Review AG Holder's motion & memo for Protective Order	0.4	0.4
5/3/2012	Review DOJ's reply to States' opposition to DOJ's motion to compel Production of Privilege Logs	0.3	0.3
5/3/2012	Participate in Status Conference Hearing with Court (includes one witness)	1.5	1.5
5/4/2012	Review State of TX notice of database production	0.2	0.2
5/4/2012	Review order re: database production and requiring jt report	0.1	0.1

5/4/2012	Participate in Conf Call with Intervenor's counsel re: privilege issues (10am-11am)	1.0	no charge
5/4/2012	Communications with Ezra Rosenberg	0.1	no charge
5/5/2012	Communications with Ezra Rosenberg	0.1	no charge
5/7/2012	Review Notice of AG Holder Concerning Federal Databases	0.1	0.1
5/7/2012	Review order regarding discovery and pre-trial deadlines	0.1	0.1
5/7/2012	Review Notice filed by TX regarding its database production	0.2	0.2
5/7/2012	Communications with Ezra Rosenberg	0.2	no charge
5/8/2012	Call with Intervenor's counsel to advise them of positions to be taken at call with ct later that day	1.0	no charge
5/8/2012	Prepare for conference call with Court set for 3:15 this	0.2	0.2
5/8/2012	Participate in telephone conference with Court and parties	0.4	0.4
5/8/2012	Communications with Ezra Rosenberg	0.3	no charge
5/9/2012	Review Order re: incomplete databases produced by State (including failure to provide data bases to Defendant	0.2	0.2
5/9/2012	Review Notice by TX of filing a document under seal	0.1	no charge
5/9/2012	Review TX's motion for leave to file document under seal	0.1	0.1
5/9/2012	Review TX's motion to respond to Court order re: deadlines	0.1	0.1
5/9/2012	Review Order granting extension to TX	0.1	0.1
5/9/2012	Review filing by TX responding to court's order re: scheduling	0.1	0.1
5/9/2012	Communications with Ezra Rosenberg	0.5	no charge
5/10/2012	Review Scott Brazil's motion pro hac vice	0.1	no charge
5/10/2012	Review MALC's motion to file an opposition under seal	0.1	no charge
5/10/2012	Review pro hac vice motion of Rebecca Robertson	0.1	no charge
5/10/2012	Conference call with co-counsel (Dunn) to discuss Kennie deposition/trial testimony	1.0	no charge
5/10/2012	Communications with Ezra Rosenberg	0.1	no charge
5/11/2012	Review motion for pro hac vice status to Karolina Lyznik	0.1	no charge
5/11/2012	Review TX's response to DOJ's motion for protective order	0.2	0.2
5/11/2012	Review Order granting Brazil, Roberston and Lyznik pro hac	0.1	no charge
5/11/2012	Review Defendant Intervenor's filing and declaration of Gary	0.3	no charge
5/11/2012	Review filing by AG Holder re: status of database discovery	0.2	0.2
5/11/2012	Review Notice by AG Holder of Federal Data base	0.1	0.1
5/11/2012	Communications with Ezra Rosenberg	0.2	no charge
5/12/2012	Communications with Ezra Rosenberg	0.1	no charge
5/13/2012	Communications with Ezra Rosenberg	0.1	no charge
5/15/2012	Review Additional Notice by AG Holder of Federal Data base	0.1	0.1
5/15/2012	Communications with Ezra Rosenberg	0.1	no charge
5/16/2012	Participate in Status Conference with Court and parties re: continuing discovery issues	0.3	0.3
5/16/2012	Review order on discovery and testimony by TX legislators	0.1	0.1
5/16/2012	Communications with Ezra Rosenberg	0.4	no charge
5/17/2012	Review order seating status conf. for 5/18.	0.1	0.1
5/17/2012	Communications with Ezra Rosenberg	0.4	no charge
5/18/2012	Review motion of John Hughes for Pro Hac Vice	0.1	no charge
5/18/2012	Review motion of Adam Mortara for Pro Hac Vice	0.1	no charge
5/18/2012	Participate in telephone conference with court and parties	0.3	0.3

5/18/2012	Review State of TX response to court order re: discovery	0.2	0.2
5/18/2012	Review Defendant AG Holder's reply to TX's opposition to motion for Protective Order	0.3	0.3
5/18/2012	Conf Call with Intervenor's counsel re: witnesses and	1.0	no charge
5/18/2012	Communications with Ezra Rosenberg	0.2	no charge
5/19/2012	Communications with Ezra Rosenberg	0.5	no charge
5/21/2012	Review Order resolving motion to compel discovery on docs and privilege logs	0.2	0.2
5/21/2012	Review order granting pro hac vice to Hughes and Mortara	0.1	no charge
5/21/2012	Review DOJ motion to exceed page limits	0.1	no charge
5/21/2012	Review TX motion to compel discovery with supporting	0.5	0.5
5/21/2012	Review TX's advisory to Court re: allegedly defective discovery (Dewhurst deposition)	0.1	0.1
5/21/2012	Review TX's motion for protective order re: depo.	0.1	0.1
5/21/2012	Review Defendant Holder's motion for protective order (re: non-party depo) w/exhibits	0.2	0.2
5/21/2012	Review draft of Intervenor's motion to compel document production and depo testimony	0.3	0.3
5/21/2012	Final review of Intervenor's motion to clarify and re-set expert report deadlines	0.2	0.2
5/21/2012	Review DOJ's motion to compel discovery re: depositions, privilege logs, with exhibits	0.4	0.4
5/21/2012	Review order denying motions to clarify or move trial date	0.2	0.2
5/21/2012	Communications with Ezra Rosenberg	0.6	no charge
5/22/2012	Communications with Ezra Rosenberg	0.5	no charge
5/23/2012	Review order denying TX's motion to file Document under	0.1	0.1
5/23/2012	Review TX's motion for extension of time: filing privilege	0.1	0.1
5/23/2012	Review TX filing re: updates to prov. logs	0.1	0.1
5/23/2012	Communications with Ezra Rosenberg	0.5	no charge
5/24/2012	Review DOJ filing re: Rep. Berman Deposition	0.1	0.1
5/24/2012	Review Order granting DOJ's motion for protective order	0.1	0.1
5/24/2012	Review order denying motion for protective order as to Rep. Berman depo (Entered: 05/24/2012)	0.1	0.1
5/24/2012	Review notice of appearance by Flaum	0.1	no charge
5/24/2012	Review notice of appearance by Harris	0.1	no charge
5/24/2012	Review notice of appearance by Pedersen	0.1	no charge
5/24/2012	Review order granting TX' motion for extension of time (re: privilege logs)	0.1	no charge
5/24/2012	Review AG Holder filing concerning email log (relates to DOJ motion to compel)	0.1	0.1
5/24/2012	Review response by Mi Familia Vota Intervenor's to motion to compel and i Familia's motion for protective order	0.3	no charge
5/24/2012	Review AG Holder Memo in opp to TX's motion to compel	0.2	0.2
5/24/2012	Review TX's Memo in Opp. To AG Holder's motion to compel	0.2	0.2
5/24/2012	Communications with Ezra Rosenberg	0.4	no charge
5/25/2012	Review Order granting AG Holder's motion for protective	0.1	0.1
5/25/2012	Review Notice of appearance for Michael Birney de Leeuw	0.1	no charge

5/25/2012	Review Order compelling both TX and U.S. to file listing of disputed privileges (U.S.) and documents under seal (TX)	0.1	0.1
5/25/2012	Review AG Holder Notice of Compliance with Order of 5/25	0.1	0.1
5/25/2012	Review AG Holder's motion to compel with logs attached	0.3	0.3
5/25/2012	Communications with Ezra Rosenberg	0.1	no charge
5/26/2012	Review TX's Notice of Compliance with 5/25 order	0.1	0.1
5/27/2012	Communications with Ezra Rosenberg	0.1	no charge
5/28/2012	Review Order concerning LT Gov Dewhurst discovery dispute	0.1	0.1
5/28/2012	Communications with Ezra Rosenberg	0.4	no charge
5/29/2012	Final review of Intervenor's opposition to TX's motion to compel discovery and depositions	0.3	no charge
5/29/2012	Review DOJ reply to TX opposition to DOJ's motion to	0.2	0.2
5/29/2012	Review TX response in opp. to DOJ's motion to compel	0.3	0.3
5/29/2012	Review TX Response to DOJ's filed privilege log	0.1	0.1
5/29/2012	Review TX's reply to DOJ's opp. To TX's motion to compel	0.1	0.1
5/29/2012	Review AG Holder motion re: sealed exhibit.	0.1	no charge
5/29/2012	Communications with Ezra Rosenberg	0.5	no charge
5/30/2012	Review notice of appearance by John McKenzie for TX	0.1	no charge
5/30/2012	Review order granting DOJ's motion re: sealed exhibit	0.1	no charge
5/30/2012	Review reply by AG Holder to TX's opp. To DOJ's motion to	0.1	0.1
5/30/2012	Communications with Ezra Rosenberg	0.2	no charge
5/31/2012	Review TX's motion to modify scheduling order	0.2	0.2
5/31/2012	Discuss with Intervenor's counsel State's motion to modify sched. Order and drafting of consolidated opposition	0.2	no charge
5/31/2012	Communications with Ezra Rosenberg	0.2	no charge
6/1/2012	Final review of Intervenor's consolidated memo opposing State of TX's motion to modify scheduling. order	0.2	no charge
6/1/2012	Communications with Ezra Rosenberg	0.2	no charge
6/4/2012	Communications with Ezra Rosenberg	0.1	no charge
6/5/2012	Review DOJ's motion to compel discovery with exhibits	0.4	0.4
6/5/2012	Review Order regarding pending motions to compel discovery	0.2	0.2
6/5/2012	Review motion to Appear Pro Hac Vice of Donita Judge	0.1	no charge
6/5/2012	Review Order requiring TX to submit docs for in camera	0.1	0.1
6/5/2012	Review AG Holder's response to TX's motion to modify scheduling order	0.1	0.1
6/5/2012	Review motion of AG Holder to modify scheduling order	0.2	0.2
6/5/2012	Communications with Ezra Rosenberg	0.1	no charge
6/6/2012	Review order requiring TX to respond to AG Holder's motion to compel	0.1	0.1
6/6/2012	Review Joint Motion to modify scheduling order by TX	0.1	0.1
6/6/2012	Review AG Holder's notice of correction	0.1	no charge
6/6/2012	Review order granting pro hac vice status to Saenz	0.1	no charge
6/6/2012	Communications with Ezra Rosenberg	0.4	no charge
6/7/2012	Final review of Intervenor's motion to modify 5/7 sched. Order	0.2	no charge
6/7/2012	Final review of Joint motion of defendant Intervenor's to modify scheduling order	0.2	no charge
6/7/2012	Review Order granting in part motion to compel of AG Holder	0.1	0.1



6/7/2012	Review TX's response to DOJ's motion to compel	0.2	0.2
6/7/2012	Review order granting joint motion of Intervenor's to modify scheduling order (re: expert rebuttal)	0.1	0.1
6/7/2012	Communications with Ezra Rosenberg	0.6	no charge
6/8/2012	Review DOJ reply to TX opposition to DOJ's motion to	0.2	0.2
6/8/2012	Review order re: Rep. Harless deposition	0.1	0.1
6/8/2012	Review Order as to pro hac vice for Donita Judge	0.1	no charge
6/8/2012	Review TX's response to DOJ's motion to modify 5/7	0.1	0.1
6/8/2012	Review order denying TX's motion to compel discovery re: from Mi Familia	0.1	no charge
6/8/2012	Communications with Ezra Rosenberg	0.1	no charge
6/9/2012	Communications with Ezra Rosenberg	0.2	no charge
6/11/2012	Review AG Holder's reply to TX's response to DOJ's motion to modify 5/7 scheduling order	0.2	0.2
6/11/2012	Review motion to withdraw Brianna Williams as Defendant	0.1	no charge
6/11/2012	Communications with Ezra Rosenberg	0.1	no charge
6/12/2012	Communications with Ezra Rosenberg	0.1	no charge
6/13/2012	Review TX's motion for protective order with exhibits	0.4	0.4
6/13/2012	Review order modifying scheduling order	0.1	0.1
6/13/2012	Review notice of appearacne for Spencer Fisher for AG Holder	0.1	no charge
6/13/2012	Review DOJ's memorandum in opposition to State's motion to compel discovery w/exhibits	0.2	0.2
6/13/2012	Communications with Ezra Rosenberg	0.5	no charge
6/14/2012	Order denying DOJ's motion to compel	0.1	0.1
6/14/2012	Review TX's reply to opposition to motion for protective order with exhibits	0.2	0.2
6/14/2012	Communications with Ezra Rosenberg	0.3	no charge
6/15/2012	Review Order granting in part and denying in part TX's motion	0.2	0.2
6/15/2012	Review pro hac vice motion of Rebecca M. Couto	0.1	no charge
6/15/2012	Communications with Ezra Rosenberg	0.1	no charge
6/17/2012	Communications with Ezra Rosenberg	0.2	no charge
6/18/2012	Review TX unopposed motion to modify order	0.1	no charge
6/18/2012	Conf. Call with Intervenor's counsel to discuss trial witnesses	1.0	1
6/18/2012	Review order requiring TX to produce 30(b)(6) deposition	0.1	0.1
6/18/2012	Communications with Ezra Rosenberg	0.2	no charge
6/19/2012	Review order granting TX motion to modify	0.1	no charge
6/19/2012	Review order granting Couto pro hac vice status	0.1	no charge
6/20/2012	Review TX motion to extend time to file findings of fact	0.2	0.2
6/20/2012	Review State of TX motion in limine (re: excluding testimony based on legislative privilege)	0.3	0.3
6/20/2012	Review State of TX motion to exclude witness of TX League Young Boters	0.2	no charge
6/20/2012	Review TX's motion and memo in limine to exclude testimony of Kennie Intervenor's expert Dr. Allan J. Lichtman	0.6	0.6
6/20/2012	Review TX's motion and memo in Limine to Preclude Evidence and Drawing Adverse Inference Based on Legislators' Assertion of Legislative Privilege	0.5	0.5

6/20/2012	Review State of TX's Live Witness List	0.2	0.2
6/20/2012	Review TX's motion and memo in limine re: Subjective Intent of Legislators	0.3	0.3
6/20/2012	Final review and edits to Consolidated Intervenor's intended witness list	0.4	0.4
6/20/2012	Review State of TX Proposed Findings of Fact	0.8	0.8
6/20/2012	Review DOJ's listing of trial witnesses	0.2	0.2
6/20/2012	Review TX's motion and memo in limine to exclude testimony of expert witness Dr. Morgan Kousser	0.8	no charge
6/20/2012	Review Appendix and attachments to State's Proposed Findings of Fact filed by State of Texas	1.4	1.4
6/20/2012	Additional Review of Appendix and attachments to State's Proposed Findings of Fact filed by State of Texas	0.6	0.6
6/20/2012	Communications with Ezra Rosenberg	0.4	no charge
6/21/2012	Legal research and review of cases cited in TX's motion in limine to exclude testimony of Kennie Intervenor's expert	0.9	0.9
6/21/2012	Review motion by AG Holder to Take Judicial Notice of	0.3	0.3
6/21/2012	Communications with Ezra Rosenberg	0.3	no charge
6/22/2012	Review motion to withdraw defendant intervenor by TX League of Young Voters	0.1	no charge
6/22/2012	Review motion in limine to exclude expert testimony with exhibits filed by AG Holder	0.5	0.5
6/23/2012	Review Jorge Sanchez's motion to appear Pro Hac Vice	0.1	no charge
6/23/2012	Draft Memo in Opposition to State of TX's motion to exclude testimony of Kennie Intervenor's expert witness Dr. Lichtman	2.8	2.8
6/23/2012	Communications with Ezra Rosenberg	0.1	no charge
6/24/2012	Additional Drafting of Memo in Opposition to State of TX's motion to exclude testimony of Kennie Intervenor's expert	1.7	1.7
6/24/2012	Redrafting & editing to memo in opposition to State's motion in limine to preclude adverse inference based on assertion of legislative privilege	0.5	0.5
6/24/2012	Redrafting & editing to memo in opposition to State's motion in limine to preclude testimony protected by legislative	0.6	0.6
6/24/2012	Communications with Ezra Rosenberg	0.3	no charge
6/25/2012	Review Proposed Findings of Fact by AG Holder	1.3	1.3
6/25/2012	Review Exhibit Index by AG Holder	0.2	0.2
6/25/2012	Final Edits to Memorandum in opposition to TX's motion in limine to exclude Testimony of Kennie expert Dr. Allan	0.5	0.5
6/25/2012	Review minute order re: pretrial conference date	0.1	0.1
6/25/2012	Review TX's Memo in Opp. to Motion in limine to exclude testimony of Major Mitchell with exhibits	0.3	no charge
6/25/2012	Review filing of supplemental appendix by State of Texas re: proposed findings of fact	0.2	0.2
6/25/2012	Review AG Holder's memo in opp. To State's motion in limine re: assertion of legislative privilege	0.4	0.4
6/25/2012	Review AG Holder's memo in opp. To State's motion in limine re: subjective intent of individual legislators	0.3	0.3

6/25/2012	Review memorandum of TX League of Young Voters in opposition to TX's motion in limine to Preclude Testimony of Newly Disclosed Witnesses with exhibits	0.4	no charge
6/25/2012	Review DOJ memo in opposition to State's motion in limine to preclude testimony based on legislative privilege	0.3	0.3
6/25/2012	Review DOJ Deposition Designations	0.5	0.5
6/25/2012	Review Memorandum in opposition to motion in limine to Exclude Testimony of J. Morgan Kousser with exhibits	0.4	no charge
6/25/2012	Communications with Ezra Rosenberg	0.2	no charge
6/26/2012	Review Defendant Intervenor's notice of removal of Dorothy Tate from witness list	0.1	no charge
6/26/2012	Review of motion to Take Judicial Notice to be filed by defendant intervenors	0.2	no charge
6/26/2012	Prepare additions to draft of Defendant Intervenor's Proposed Findings of Fact	0.7	0.7
6/26/2012	Select and designate deposition excerpts for clients (Kennie, Burns), Sen. Ellis, Wood.	0.4	0.4
6/26/2012	Communications with Ezra Rosenberg	0.9	no charge
6/27/2012	Review order granting motion to withdraw Williams as defendant intervenor	0.1	no charge
6/27/2012	Review agreement between parties re: DOJ's motion in limine	0.2	no charge
6/27/2012	Review Order granting additional time to file motion in limine re: Dr. Sager	0.1	no charge
6/27/2012	Review order withdrawing Johnson as defendant intervenor	0.1	no charge
6/27/2012	Communications with Ezra Rosenberg	0.9	no charge
6/28/2012	Review motion of Asha Spencer to appear Pro Hac Vice	0.1	no charge
6/28/2012	Review order granting Spencer pro hac vice status	0.1	no charge
6/28/2012	Communications with Ezra Rosenberg	0.1	no charge
6/29/2012	Review order directing Holder to file exhibits	0.1	no charge
6/29/2012	Review AG Holder's <i>Erratum</i> re: Findings of fact	0.1	no charge
6/29/2012	Review Stipulation re: motion in Limine to Exclude Expert	0.1	0.1
6/29/2012	Review state's reply to opposition to motion in limine	0.3	0.3
6/29/2012	Review state's reply to opposition to motion in limine re: TX League of Young Voters' re: newly disclosed witness	0.3	no charge
6/29/2012	Review State's reply to opposition to motion in limine to preclude adverse inference based on assertion of legislative	0.3	0.3
6/29/2012	Review State's reply to opposition to motion in limine to preclude testimony protected by legislative privilege	0.3	0.3
6/29/2012	Review State's reply to opposition to motion in limine to preclude testimony of Dr. Morgan Kousser	0.3	no charge
6/29/2012	Review State's reply to opposition to motion in limine to preclude testimony of Kennie Intervenor's expert Dr. Allan	0.4	0.4
6/29/2012	Review motion pro hac vice for Luis Figueroa	0.1	no charge
6/29/2012	Review Doj REPLY TO TX opposition to DOJ's motion in limine to exclude documents/testimony of Major Mitchell	0.3	no charge
6/29/2012	Review State of TX's counter designations and objections to depo designations	0.3	0.3
6/29/2012	Communications with Ezra Rosenberg	0.5	no charge

6/30/2012	Review TX's notice of correction	0.1	no charge
6/30/2012	Review Defendant Intervenor's <i>Errata</i>	0.1	no charge
6/30/2012	Communications with Ezra Rosenberg	0.2	no charge
7/1/2012	Review DOJ's <i>Trial Exhibits</i>	0.3	0.3
7/1/2012	Review TX's response to Defendant-Intervenor's Proposed Findings of Fact and Conclusions of Law	0.4	0.4
7/1/2012	Review TX's response re; Proposed Findings of Fact and Conclusions of Law	0.3	0.3
7/1/2012	Review filing of exhibits and attachments by TX	0.3	no charge
7/1/2012	Review order granting Figueroa pro hac vice status	0.1	no charge
7/1/2012	Tele Conf/Meeting of Intervenor's counsel re: trial	2.0	no charge
7/1/2012	Meet with and prepare Dr. Lichtman for Deposition	2.3	2.3
7/1/2012	Communications with Ezra Rosenberg	0.7	no charge
7/2/2012	Review DOJ's <i>Trial Exhibits</i>	0.6	0.6
7/2/2012	Review DOJ's motion for immediate relief re: State's response to proposed findings of fact	0.3	0.3
7/2/2012	Review DOJ's advisory re: stricken proposed findings &	0.2	0.2
7/2/2012	Communication with Ezra Rosenberg re: whether to join DOJ filing re: inadequacy of TX's response to findings of fact	0.1	0.1
7/2/2012	Review exhibit list of State of TX	0.2	0.2
7/2/2012	Deposition by TX of Kennie Intervenor's Expert Witness Dr.	6.8	6.8
7/2/2012	Review Notice by TX of Stipulation re: expert testimony	0.1	0.1
7/2/2012	Review Advisory filed by DOJ concerning stricken portions of proposed findings	0.2	no charge
7/2/2012	Review Proposed Findings of Fact by Defendant Eric Holder	0.3	0.3
7/2/2012	Review Expert Deposition Designations by Defendant Eric	0.4	0.4
7/2/2012	Make additions to Defendant Intervenor's <i>Trial Exhibits</i> for	0.3	0.3
7/2/2012	Review DOJ notice of <i>Trial Exhibit List</i>	0.2	0.2
7/2/2012	Communications with Ezra Rosenberg	0.5	no charge
7/3/2012	Review State of TX response to DOJ motion for immediate	0.4	no charge
7/3/2012	Review <i>errata</i> by State of TX re: proposed findings of fact	0.1	0.1
7/3/2012	Review motion of Thomas Saenz for pro hac vice	0.1	no charge
7/3/2012	Review Intervenor's clarification of trial exhibit listing	0.1	no charge
7/3/2012	Review Texas' Filing Supplement to Joint Appendix	0.1	0.1
7/3/2012	Review motion re: Camarillo testimony	0.2	no charge
7/3/2012	Review order re: extension of time	0.1	no charge
7/3/2012	Review State's motion to seal document	0.1	no charge
7/3/2012	Review order declaring motion in limine moot	0.1	no charge
7/3/2012	Review order denying Defendant Holder's motion for	0.1	0.1
7/3/2012	Review order denying TX's motion in limine re: adverse inference based on legislative privilege	0.1	0.1
7/3/2012	Review order granting TX's motion in limine to preclude testimony of RX League of Young Voters' newly disclosed	0.1	no charge
7/3/2012	Review order granting motion to take judicial notice of census	0.1	0.1
7/3/2012	Review order denying TX's motion in limine re: legislative	0.1	0.1
7/3/2012	Review Order denying TX's motion in limine to exclude testimony of Kennie Intervenor's expert, Dr. Lichtman	0.1	0.1



7/3/2012	Review Order denying TX's motion in limine to exclude testimony of K expert, Dr. Kousser	0.1	0.1
7/3/2012	Review order denying Defendant Holder's motion in limine to exclude testimony of Major Mitchell	0.1	0.1
7/3/2012	Review Order denying TX's motion in limine to preclude evidence regarding subjective intent of individual legislators	0.1	0.1
7/3/2012	Review TX's advisory re: deposition designations	0.1	0.1
7/3/2012	Review DOJ's motion to take Judicial Notice of Senate Rules	0.2	0.2
7/3/2012	Review order re: hyperlinks in proposed findings of fact	0.1	0.1
7/3/2012	Review notice of appearance by Richard Dellheim for AG	0.1	no charge
7/3/2012	Communications with Michelle Yeary and Ezra Rosenberg re: preparation of consolidated reply to TX's failure to offer counter designations (for filing on 7/5)	0.2	0.2
7/3/2012	Communications with Brian Raphael/Ezra Rosenberg re: preparation of hyperlinked findings of fact and Hebert additions to proposed findings of fact re: Lichtman critique of	0.2	0.2
7/3/2012	Communications with Ezra Rosenberg	1.1	no charge
7/4/2012	Review notice of appearance by Bryan Sells for AG Holder	0.1	no charge
7/4/2012	Review DOJ reply re: proposed findings of fact	0.1	0.1
7/4/2012	Revisions to reply of Defendant Intervenors proposed findings	0.6	0.6
7/4/2012	Communications with Ezra Rosenberg	1.0	no charge
7/5/2012	Review TX's filing supplemental reply appendix	0.2	0.2
7/5/2012	Review order re: witness lists of AG Holder and Defendant-Intervenors and scheduling issues	0.1	0.1
7/5/2012	Final revisions and review of Defendant-Intervenors objections and counter designations of deposition testimony	0.2	0.2
7/5/2012	Review order changing time of telephonic status conference with court and parties (7/6)	0.1	0.1
7/5/2012	Review AG Holder's Reply regarding deposition designations	0.2	0.2
7/5/2012	Communications with Ezra Rosenberg	0.6	no charge
7/6/2012	Edit/revise counter proposed findings of fact/deposition	0.2	0.2
7/6/2012	Revisions to Defendant-Intervenors witness list and order of	0.2	0.2
7/6/2012	Communications with Ezra Rosenberg to coordinate the order of witnesses at trial for all Defendant-Intervenors and AG	0.2	0.2
7/6/2012	Review order granting TX motion to file under seal	0.1	0.1
7/6/2012	Review order granting motion re: Camarillo testimony	0.1	0.1
7/6/2012	Review order granting motion to take judicial notice	0.1	0.1
7/6/2012	Conf. Call with Intervenors' counsel re: case prep	1.0	no charge
7/6/2012	Review TX's motion extension of time re: JT. Req. for Judicial	0.1	no charge
7/6/2012	Review TX's response to Defendant Intervenors' motion for judicial notice	0.1	0.1
7/6/2012	Review filing by DOJ Listing order of trial witnesses	0.1	0.1
7/6/2012	Participate in telephonic conference call with court and parties re: witnesses and trial	0.5	0.5
7/6/2012	Review notice of appearance of Matthew Colangelo for AG	0.1	no charge
7/6/2012	Communications with Ezra Rosenberg	1.9	no charge
7/7/2012	Communications with Ezra Rosenberg	0.6	no charge

7/8/2012	Review Order Overruling TX's objection to live witness and depo designations.	0.2	0.2
7/8/2012	Trial Preparation. Review witness depositions, exhibits	6.5	6.5
7/8/2012	Communications with Ezra Rosenberg	0.3	no charge
7/9/2012	Final review/edits to reply to State of TX's opposition to Defendant-Intervenors' motion for judicial notice	0.1	no charge
7/9/2012	Review Pro Hac Vice motion of Reynolds Brissenden for TX.	0.1	no charge
7/9/2012	Review motion to withdraw by O'Connor	0.1	no charge
7/9/2012	Review order granting pro hac vice to Brissenden	0.1	no charge
7/9/2012	Review order granting O'Connor mot. to withdraw	0.1	no charge
7/9/2012	Review TX's designations of Senator Uresti's Deposition	0.2	0.2
7/9/2012	Attend and participate in trial. Witnesses: Ingram, Aliseda, Mitchell, Williams, & Sager 9-5:30	8.5	8.5
7/9/2012	Trial Preparation. Review notes of trial testimony from that day. Review witness depositions, exhibits, prepare witness	5.3	5.3
7/9/2012	Communications with Ezra Rosenberg	0.1	no charge
7/10/2012	Review Order granting Defendant Intervenors' motion to take judicial notice of facts	0.1	0.1
7/10/2012	Attend and participate in trial. Witnesses: Professor Sager (cont.), Martinez Fischer, Anchia, Professor Kousser, and	8.5	8.5
7/10/2012	Trial Preparation. Review notes of trial testimony from that day (1.3). Review Wood and Ellis depositions (1.7) , exhibits, prepare witness outlines (0.5) , prepare Sen. Ellis (2.5) and Buck Wood (2.0) for trial testimony	8.0	8
7/11/2012	Attend and participate in trial. Witnesses: Shaw, Rodriguez, Camarillo, Rev. Jackson, Senator Ellis, Buck Wood, Professor Flores, Dr. Marker, Senator Uresti (video)	8.5	8.5
7/11/2012	Trial Preparation. Review notes of trial testimony from that day(0.5). Review witness depositions (0.9), exhibits, prepare witness outlines(1.1), prepare Sen. Davis (2.1) and Dr. Lichtman (2.0) for trial testimony	6.5	6.5
7/12/2012	Review TX's counter expert witness deposition designations	0.2	0.2
7/12/2012	Review Amended List of Trial Exhibits and Second Supplemental Appendix for Defendant Intervenors	0.1	no charge
7/12/2012	Review reply designation for Sen. Uresti by AG Holder	0.2	0.2
7/12/2012	Review filing by DOJ of Apache County opinion	0.2	0.2
7/12/2012	Review expert witness reply depo designations by AG Holder w/exhibits	0.2	0.2
7/12/2012	Attend and participate in trial. Trial Witnesses: Senator Carlos Uresti (video), Senator Wendy Davis, Dr. Allan Lichtman, and Professor Ansolabehere.	8.5	8.5
7/12/2012	Communication and coordination w/E. Rosenberg re: closing	0.5	0.5
7/12/2012	Prepare outline of closing argument with notes	3.8	3.8
7/12/2012	Prepare PowerPoint presentation for use in closing argument	1.6	1.6
7/13/2012	Review TX Advisory regarding EIC's (Election Ident. Cert.)	0.3	0.3
7/13/2012	Review Mi Familia's advisory clarifying docs needed to obtain	0.2	no charge
7/13/2012	Trial. Closing Arguments.	3.5	3.5
7/13/2012	Review Defendant-Intervenors' Notice Withdrawing Trial	0.1	no charge

7/14/2012	Review DOJ Objections to State's Trial Exhibits (filed last day	0.5	0.5
7/14/2012	Review DOJ's revised trial exhibit list (filed last trial day)	0.2	0.1
7/17/2012	Review DOJ's filing of exhibits 579-598	0.1	no charge
7/17/2012	Review TX's notice regarding DPS data and VRNID data	0.1	0.1
7/17/2012	Review TX's filing exhibit under seal	0.1	no charge
7/17/2012	Review TX's objections to Defendant-Intervenors' Trial	0.4	0.4
7/17/2012	Review TX's objections to AG Holder's Trial Exhibits	0.5	0.5
7/17/2012	Review Response Defendant Intervenors' Objection to State of Texas's Trial Exhibits	0.1	no charge
7/18/2012	Review TX's motion to file exhibit B under seal	0.1	0.1
7/18/2012	Review State of TX's revised trial exhibit list	0.2	0.2
7/18/2012	Review filing of trial exhibits by Texas	0.1	0.1
7/19/2012	Review motion to seal exhibits by Texas	0.2	0.2
7/19/2012	Communication from state regarding return to TX of data base	0.1	0.1
7/19/2012	Review Texas' Notice of filing under seal	0.1	no charge
7/19/2012	Review Defendant Intervenors' response to TX's objections to Defendant Intervenors' trial exhibits	0.2	no charge
7/19/2012	Communications with Ezra Rosenberg	0.1	no charge
7/23/2012	Communications with co-counsel (Ezra Rosenberg) about gathering all data base disks from Defendant-Intervenors and returning them to State of TX counsel (at state's request)	0.2	0.2
7/23/2012	Review order granting TX's motion for to File exhibits under	0.1	0.1
7/26/2012	Review response by AG Holder to TX's objections to Defendant's trial exhibits	0.2	0.2
7/26/2012	Review AG Holder's response re: EICs	0.1	no charge
7/26/2012	Communications with Ezra Rosenberg	0.2	no charge
7/27/2012	Communications with Ezra Rosenberg	0.2	no charge
7/31/2012	Communications with Ezra Rosenberg	0.2	no charge
8/1/2012	Communications with Ezra Rosenberg	0.1	no charge
8/3/2012	Review filing for Defendant Intervenors of recent photo ID	0.1	no charge
8/6/2012	Communications with Ezra Rosenberg	0.1	no charge
8/20/2012	Review AG's filing of Notice of Determination	0.1	0.1
8/28/2012	Communications with Ezra Rosenberg	0.4	no charge
8/30/2012	Read opinion of three judge court	1.9	1.9
8/30/2012	Review order denying Texas's request for judicial preclearance of Senate Bill 14 and ordering submission of joint schedule.	0.1	0.1
8/30/2012	Communications with Ezra Rosenberg	0.3	no charge
9/5/2012	Review AG Holder's filing of Section 5 determination	0.1	0.1
9/5/2012	Communications with Ezra Rosenberg	0.2	no charge
9/6/2012	Communications with Ezra Rosenberg	0.1	no charge
9/12/2012	Review AG Holder filing re: proposed briefing schedule for	0.1	0.1
9/12/2012	Review AG Holder's filing of no-determination letter	0.1	0.1
9/13/2012	Communications with Ezra Rosenberg	0.1	no charge
9/14/2012	Review order setting briefing schedule on Claim II	0.1	0.1
9/14/2012	Communications with Ezra Rosenberg	0.1	no charge
9/21/2012	Review DOJ motion for extension of time to file response to	0.1	no charge
9/24/2012	Review Order granting extension to all defendants (including	0.1	0.1

10/1/2012	Review State's motion for summary judgment	1.1	1.1
10/3/2012	Conf. call among all Defendant Intervenor to discuss drafting responsibilities/division of labor & issues raised by TX motion for summary judgment	1.2	no charge
10/12/2012	Communications with Ezra Rosenberg	0.1	no charge
10/15/2012	Communications with Ezra Rosenberg	0.1	no charge
10/19/2012	Review draft memorandum in opposition to State's Motion for Summary Judgment and offer edits and comments to same	0.5	0.5
10/21/2012	Communications with Ezra Rosenberg	0.1	no charge
10/22/2012	Final review Intervenor's cross motion for summary judgment	1.0	no charge
10/22/2012	Review DOJ's motion for summary judgment on Claim II	0.5	no charge
10/22/2012	Communications with Ezra Rosenberg	0.1	no charge
10/26/2012	Communications with Ezra Rosenberg	0.1	no charge
10/31/2012	Review order granting TX's telephone request to exceed page	0.1	0.1
10/31/2012	Review State of TX Memorandum in opposition to Cross motions for summary judgment	0.3	0.3
11/1/2012	Review State of Texas' reply to Defendant and Intervenor's opposition to State's motion for summary judgment	0.3	0.3
11/1/2012	Communications with Ezra Rosenberg	0.1	no charge
11/8/2012	Communications with Ezra Rosenberg	0.1	no charge
11/11/2012	Communications with Ezra Rosenberg	0.1	no charge
11/12/2012	Communications with Ezra Rosenberg	0.1	no charge
11/13/2012	Review DOJ reply to State's opposition to cross motions for summary judgment	0.3	0.3
11/13/2012	Review final draft of memorandum in opposition to State's motion for summary judgment. Communicate to E. Rosenberg	0.1	0.1
11/13/2012	Review AG Holder's memorandum in opposition to State's motion for Summary Judgment	0.3	0.3
11/13/2012	Communications with Ezra Rosenberg	0.3	no charge
11/16/2012	Review order requiring parties to meet and confer on deferring	0.1	0.1
11/16/2012	Communications with Ezra Rosenberg	0.1	no charge
11/26/2012	Communications with Ezra Rosenberg	0.1	no charge
11/28/2012	Review Berkower motion to withdraw as attorney for Holder	0.1	no charge
11/28/2012	Review order granting motion to withdraw (Berkower)	0.1	no charge
11/28/2012	Edits to notice by Intervenor in response to court order about deferring ruling until Shelby County decision	0.1	0.1
11/28/2012	Communications with Ezra Rosenberg	0.2	no charge
11/29/2012	Review notice by AG Holder.	0.1	0.1
11/29/2012	Review State of TX's response to court order re: deferring a ruling until Shelby County is decided	0.2	0.2
11/29/2012	Communications with Ezra Rosenberg	0.2	no charge
11/30/2012	Review motion for entry of judgment by State of TX with supporting memo	0.2	0.2
11/30/2012	Communications with Ezra Rosenberg	0.1	no charge
12/7/2012	Communications with Ezra Rosenberg	0.1	no charge
12/11/2012	Communications with Ezra Rosenberg	0.1	no charge



12/12/2012	Draft and make edits to Defendant-Intervenors' memorandum in opposition to TX's motion for Entry of Final Judgment as to	0.3	0.3
12/13/2012	Communications with Ezra Rosenberg	0.1	no charge
12/14/2012	Review response by AG Holder to TX's motion for Entry of Final judgment	0.2	0.2
12/14/2012	Communications with Ezra Rosenberg	0.1	no charge
12/17/2012	Review order pursuant to rule 54, FRCP.	0.1	0.1
12/17/2012	Review TX's notice of <i>appeal to Supreme Court</i>	0.1	0.1
12/18/2012	Tele. Conf call with clients re: notice of appeal by TX	0.3	0.3
12/18/2012	Communications with Ezra Rosenberg	0.2	no charge
12/20/2012	Communications with Ezra Rosenberg	0.1	no charge
12/21/2012	Review order granting unopposed motion to hold attys fees in	0.1	0.1
1/4/2013	Communications with Ezra Rosenberg	0.1	no charge
1/18/2013	Communications with Ezra Rosenberg	0.1	no charge
2/8/2013	Review Couto motion to withdraw as counsel for Mi Familia	0.1	no charge
2/8/2013	Review order granting Couto motion to withdraw	0.1	no charge
2/19/2013	Edit Reply to State's Opposition to Kennie Intervenors' Motion to Intervene	0.3	0.3
2/19/2013	Communications with Ezra Rosenberg	0.1	no charge
2/21/2013	Communications with Ezra Rosenberg	0.1	no charge
2/24/2013	Communications with Ezra Rosenberg	0.1	no charge
3/1/2013	Communications with Ezra Rosenberg	0.1	no charge
4/18/2013	Communications with Ezra Rosenberg	0.1	no charge
4/19/2013	Communications with Ezra Rosenberg	0.1	no charge
4/24/2013	Review Ho's motion to withdraw as counsel	0.1	no charge
4/24/2013	Review order granting Ho's motion to withdraw	0.1	no charge
4/24/2013	Communications with Ezra Rosenberg	0.2	no charge
5/3/2013	Communications with Ezra Rosenberg	0.1	no charge
5/10/2013	Communications with Ezra Rosenberg	0.1	no charge
5/14/2013	Review Boddie's motion to withdraw as counsel	0.1	no charge
5/14/2013	Review order granting Boddie motion to withdraw	0.1	no charge
5/15/2013	Review Adegbile's motion to withdraw as counsel	0.1	no charge
5/16/2013	Review order granting Adegbile's motion to withdraw	0.1	no charge
5/23/2013	Review order granting DOJ's motion to exceed page limit	0.1	no charge
6/20/2013	Review TX's deposition designations	0.3	0.3
6/26/2013	Communications with Ezra Rosenberg	0.3	no charge
6/27/2013	Review judgment/ruling of U.S. Supreme Court	0.1	0.1
7/11/2013	Review Flaum's motion to withdraw as counsel	0.1	no charge
7/12/2013	Review State of TX Corrections to Sager Supp. Declaration	0.2	0.2
7/12/2013	Review order granting Flaum's motion to withdraw	0.1	no charge
7/25/2013	Review filing by DOJ of Shelby County decision	0.1	0.1
8/1/2013	Communications with Ezra Rosenberg	0.2	no charge
8/8/2013	Review Motion to Dismiss filed by State of TX	0.2	0.2
8/21/2013	Communications with Ezra Rosenberg	0.3	no charge
8/22/2013	Review DOJ response to State's motion to dismiss	0.1	0.1
8/22/2013	Edits to response of intervenors to state's motion to dismiss	0.2	0.2
8/22/2013	Review separate filing by Mi Familia intervenors	0.1	no charge

8/22/2013	Communications with Ezra Rosenberg	0.1	no charge
8/27/2013	Review order granting TX's motion to dismiss	0.1	0.1
8/28/2013	Initial Draft outline of motion for attys fees and expenses	1.5	1.5
8/30/2013	Legal Research on fees motions in DC court/Supreme Court	5.5	5.5
9/2/2013	Draft Motion for attorneys' fees and expenses	4.9	4.9
9/4/2013	Edits to Fee Motion	1.3	1.3
9/4/2013	Communications with Ezra Rosenberg	0.1	no charge
9/5/2013	Draft Hebert Declaration for Fee Motion	3.0	3
9/7/2013	Review Time Sheets for attaching to fee motion	2.1	2.1
9/7/2013	Communications with Ezra Rosenberg	0.1	no charge
9/8/2013	Review Time Sheets for attaching to fee motion	1.9	1.9
9/8/2013	Review Lichtman Invoice from 8/2/2012	0.1	no charge
9/8/2013	Communications with Ezra Rosenberg	0.1	no charge
9/9/2013	Review Dunn Time Sheets	1.0	no charge
9/9/2013	Review Brazil Time Sheets	<u>0.5</u>	<u>no charge</u>

TOTAL HOURS

271.7

182.4

## **EXHIBIT D**

**Campaign Legal Center Out-of-Pocket Expenses**

Expert Witness Costs for Michael C. Herron	\$14,852.67
Travel for Litigation Team (including experts)	\$22,545.08
Printing and Production (including open records request costs, printing, transcripts, briefs, etc.)	\$10,517.19
Postage	\$115.00
Reimbursement from co-counsel	-\$4,039.07
<b>Total</b>	<b>\$43,990.87</b>

**Additional Outstanding Expert Expenses**

Dr. Lichtman	\$28,800.00
Dr. Sanchez	\$10,000.00
Dr. Barretto	\$10,000.00
Mr. Korbel	\$21,742.50
<b>Total</b>	<b>\$70,542.50</b>



**Campaign Legal Center**  
**Statement of Activities**  
**For the Period Ending December 31, 2016**

Reporting Book:

As of Date:

Initiative:

	Year Ending 12/31/2016	Year Ending 12/31/2015	Year Ending 12/31/2014	Year Ending 12/31/2013	TOTAL COSTS
	Actual	Actual	Actual	Actual	
<b>Expenses</b>					
Expert Witnesses	0.00	0.00	14,852.67	0.00	<b>14,852.67</b>
Printing / Deposition / Transcript	3,530.10	-104.59	7,091.68	0.00	<b>10,517.19</b>
Postage	0.00	0.00	115.00	0.00	<b>115.00</b>
Travel	1,010.75	1,178.03	20,356.30	0.00	<b>22,545.08</b>
<b>Total Expenses</b>	<b>4,540.85</b>	<b>1,073.44</b>	<b>42,415.65</b>	<b>0.00</b>	<b>48,029.94</b>
Reimbursement from Brazil & Dunn					-3,741.41
Reimbursement for brief costs					-297.66
<b>Total Net Expenses</b>					<b>43,990.87</b>

Campaign Legal Center  
 General Ledger Report  
 ACCRUAL  
 1/1/2014  
 12/31/2018  
 6120--Texas  
 Voter ID Case

Doc Dt.	Memo / Description	Debit	Credit
4/16/2014	Baggage Fee	25.00	
4/16/2014	Hotel	538.17	
4/16/2014	Taxi	15.00	
6/4/2014	Taxi from Jenner & Block Meeting	8.50	
6/17/2014	Flight for TX Travel	471.50	
6/17/2014	Hotel WiFi for TX Travel	10.95	
6/17/2014	Hotel for TX Travel	164.26	
6/17/2014	In Flight WiFi for TX Travel	10.83	
6/17/2014	In Flight WiFi for TX Travel	12.00	
6/17/2014	In Flight WiFi for TX Travel	12.00	
6/17/2014	Rental car for TX Travel	99.81	
7/1/2014	Taxi to Mtg for Texas Photo ID Case	8.09	
7/1/2014	Taxi to Mtg for Texas Photo ID Case	32.00	
7/14/2014	Parking for photo ID Case Meeting	24.00	
8/4/2014	Emma Simson Flight to TX for depositions	565.50	
8/4/2014	Emma Simson Hotel in TX for depositions	197.73	
8/4/2014	Hotel in Houston, TX for depositions in Voter ID Case	174.33	
8/4/2014	Taxi from Houston Airport to Hotel for depositions	71.30	
8/4/2014	Taxi to Mtg	16.00	
8/4/2014	Uber to Mtg at WilmerHale	21.00	
8/6/2014	Armand Derfner: Con#40015538817	2,380.50	
8/6/2014	Chad Dunn: Con#40014519860	2,380.50	
8/6/2014	Chad Dunn: Con#40014519861	2,380.50	
8/6/2014	Gerry Hebert: Con#40015538825	2,380.50	
8/6/2014	Neil Baron: Con#40014670870	2,380.50	
8/6/2014	Scott Brazil: Con#40015538782	2,380.50	
8/7/2014	Travel Reimbursement for Mtg in DC (Texas Photo ID Case)	155.10	
8/26/2014	Flight	189.10	
8/26/2014	Flight	241.10	
8/26/2014	Flight Change Fee	333.10	
8/26/2014	Flight to Corpus Cristi	143.10	
9/2/2014	Airfare from Corpus Cristi to Houston	389.10	
9/2/2014	Airfare to Corpus Cristi	400.60	
9/2/2014	Baggage Fees	60.00	
9/2/2014	G. Hebert - Taxi to airport from residence	28.70	
9/2/2014	R. Carrier room for trial (booked under Victoria Hebert)	264.50	
9/2/2014	Refund for processing error on R. Carrier trial hotel		132.25
9/2/2014	Rental Car - Travel to Corpus Cristi	276.10	
9/11/2014	Allan Lichtman_Hotel Room & Incidentals	274.45	

9/11/2014	Anna Hernandez_Hotel Room	132.25	
9/11/2014	Barreto_Hotel Room & Incidentals	364.50	
9/11/2014	Corpus Cristi Hotel Error Refund		1,014.52
9/11/2014	Corpus Cristi Hotel Processing Error (Refunded)	1,014.52	
9/11/2014	G. Hebert_Airfare to DC (rescheduled flight change fee)	311.00	
9/11/2014	George Korbel_Hotel Room	132.25	
9/11/2014	Tom Cornish_Room & Incidentals	165.25	
9/11/2014	___Hotel Room (Booked under Victoria Hebert)	132.25	
9/11/2014	___Hotel Room (Booked under Victoria Hebert)	132.25	
9/11/2014	___Hotel Room (Booked under Victoria Hebert)	264.50	
9/17/2014	Baggage Fees - TX Photo ID Trial	60.00	
9/17/2014	Return Flight Change - TX Photo ID Trial	533.00	
9/17/2014	Taxi - Airport to Home - TX Photo ID Trial	21.65	
9/17/2014	Uber to Airport - TX Photo ID Trial	33.00	
9/24/2014	Armand Derfner_Hotel Room for Closing Arguments	132.25	
9/24/2014	Baggage Fees- Flight to Closing Arguments	25.00	
9/24/2014	Baggage Fees- Flight to Closing Arguments	25.00	
9/24/2014	Chad Dunn_Hotel Room & Incidentals	199.62	
9/24/2014	J. Bone_Flight to TX for Closing Arguments	482.70	
9/24/2014	J. Bone_Hotel Room for Closing Arguments	132.25	
9/24/2014	Rental Car for travel to trial (refunded later)	305.25	
9/25/2014	G. Hebert - Flight Change	200.00	
9/25/2014	G. Hebert - Flight to TX	408.60	
9/25/2014	Taxi from DCA to Residence	37.98	
9/25/2014	Taxi to DOJ	13.95	
9/25/2014	Taxi to Residence	32.00	
10/3/2014	Airport Parking - TX Travel	33.20	
10/3/2014	Courtyard Marriot Hotel - TX Travel	398.04	
10/3/2014	Flight to TX	333.10	
10/3/2014	Gas for Rental Car - TX Travel	20.06	
10/3/2014	Rental Car - TX Travel	256.00	
12/15/2014	Omni Hotel Refund_TX Voter ID Case		4,344.27
4/10/2015	GH card; 3.11.15 BWI parking	48.00	
4/10/2015	GH card;flights on SW for GH and JB to Atlanta and Texas	716.00	
5/15/2015	GH card; Monteleone Carosel New Orleans 4.30.15 and 5.1.15 HOTEL	314.03	
5/15/2015	GH card; bag fees for GH and JB on SW 4.27	50.00	
5/15/2015	internet for SW flight for GH and JB 4.27	25.00	
5/15/2015	refund for online internet for GH to TX 5.5.15	25.00	
5/31/2016	Airport Taxi	34.42	
5/31/2016	D. Lang Flight to TX	481.20	
5/31/2016	G. Hebert Flight to TX	481.20	
5/31/2016	Taxi from mtg	7.60	
5/31/2016	Taxi to mtg	6.33	
		<b>28,036.12</b>	<b>5,491.04</b>

<b>Total</b>	<b>\$22,545.08</b>
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Campaign Legal Center  
General Ledger Report  
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6120--Texas  
Voter ID Case

Doc Dt.	Memo / Description	Vendor Name	Debit
10/14/2014	Consulting Services & Expenses - TX Photo ID 2014_ Inv. Date 9.04.2014	Michael C. Herron	5,591.64
10/14/2014	Consulting Services & Expenses - Texas ID 2014_Inv. Date 8.26.2014	Michael C. Herron	7,261.03
10/14/2014	Consulting Services - Texas ID 2014_Inv. Date 8.31.2014	Michael C. Herron	2,000.00
			<u>14,852.67</u>
			<u>14,852.67</u>

Campaign Legal Center  
 General Ledger Report  
 ACCRUAL  
 1/1/2014  
 12/31/2018  
 6120--Texas  
 Voter ID Case

Doc Dt.	Memo / Description	Vendor Name	Debit	Credit	Balance
					0.00
6/11/2014	Open Records Request- Texas Voter ID	San Jacinto County	51.30		51.30
6/12/2014	Deposit for Open Records Request- TX Photo ID Case	Department of State Health Services	194.00		245.30
8/20/2014	Document Preparation for Texas Photo ID Case	Service Docs, Inc.	501.18		746.48
8/29/2014	Transcript Copies - TX Photo ID Case	Exceptional Reporting	12,000.00		12,746.48
9/17/2014	Hotel Printing Charges - TX Photo ID Trial		20.52		12,767.00
11/20/2014	Refund for Document Request_TX Voter ID	Department of State Health Services		194.00	12,573.00
11/20/2014	Refund for Transcripts_TX Voter ID	Exceptional Reporting		5,481.32	7,091.68
2/25/2015	Reimbursement for Brief Printing Costs			297.66	-297.66
2/27/2015	Brief Printing (TX Voter ID)	Bank of America Business Card	193.07		-104.59
11/22/2016	TX Case Transcripts - Pymt for revised invoice	Laura Wells, Official Reporter	3,530.10		3,530.10
			<b>16,490.17</b>	<b>5,972.98</b>	<b>10,517.19</b>

**Allan J. Lichtman (060-38-1842)**

**9219 Villa Drive, Bethesda, MD 20817 (301) 530-8262, 04-11-2019**

**Re: Expert Witness Research During Corpus Christi Trial - Texas  
Voter ID Case**

**Attention:**

**Chad Dunn – Contact Attorney**

**Summary of Scope of Work**

**The bill outlined below is for the comprehensive work I performed in regard to the voter ID trial in Corpus Christi, TX, including the study of reports, documentary and statistical research, preparation of written report, preparation for trial testimony, travel to Corpus Christi, trial testimony and time in trial waiting for potential testimony in court.**

- 1. Study of expert reports. 5 Hrs.**
- 2. Documentary research. 6 HRS**
- 3. Statistical research. 7 HRS**
- 4. Preparation of written report. 21 HRS**
- 5. Preparation for trial. 5 HRS**
- 6. Travel to Corpus Christi from DC 6 HRS**
- 7. Trial testimony and attendance at trial. 16 HRS**
- 8. Travel to DC from Corpus Christi 6 HRS**

**72 hours at \$400 per hour.**

**Total Bill: \$28,800**



Gabriel R Sanchez, LLC  
3400 Calle Vigo NW  
Albuquerque NM 87104

March 12, 2019

Re: Expert Witness Research During Trial - Texas Voter ID Case

Attention:  
Chad Dunn – Contact Attorney

Summary of Scope of Work

The following 40 hours of work outlined more specifically below is focused on the travel to/from Corpus Christi, TX for the trial, preparation for trial testimony, and time in trial waiting for potential testimony in court.

Description of Duties/Time Allotment

- Pre-trial preparation: review of our expert witness report, analysis of all deposition scripts relevant to court testimony, conference calls with Matt Barreto – 8 hours
- Travel from Albuquerque to Corpus Christi, TX - 4 hours
- Evening review of our expert witness report, deposition transcripts, opposition report – 4 hours
- Time waiting potential testimony in court (two full days in court) – 16 hours
- Evening review of our expert witness report, deposition transcripts, opposition report before second day of trial – 4 hours
- Travel home from Corpus Christi, TX – 4 hours

**Total Hours – 40 - \$250.00 per/hr**

**Total Cost - \$10,000**

Dr. Matt A. Barreto  
6619 Heritage Drive  
Agoura Hills, CA 91301

March 14, 2019

Re: Expert Witness Research During Trial - Texas Voter ID Case

Attention:  
Chad Dunn – Contact Attorney

Summary of Scope of Work

The following 40 hours of work outlined more specifically below is focused on the travel to/from Corpus Christi, TX for the trial, preparation for trial testimony, and time in trial waiting for potential testimony in court.

Description of Duties/Time Allotment

- Pre-trial preparation: review of our expert witness report, analysis of all deposition scripts relevant to court testimony, conference calls with Dr. Gabriel Sanchez – 8 hours
- Travel from Seattle, WA to Corpus Christi, TX - 5 hours
- Evening review of our expert witness report, deposition transcripts, opposition report – 3 hours
- Time participating in testimony in court (two full days in court) – 16 hours
- Evening review of our expert witness report, deposition transcripts, opposition report before second day of trial – 3 hours
- Travel home from Corpus Christi, TX – 5 hours

**Total Hours – 40 - \$250.00 per/hr**

**Total Cost - \$10,000**

In the United States District Court  
For the Southern District of Texas  
Corpus Christi Division

MARC VEASSEY, <i>et al.</i>	)	
	)	
Plaintiffs	)	
	)	
vs	)	CA 2:132-cv-193
	)	(consolidated with 2:13-cv-63)
	)	
RICK Perry <i>et al.</i>	)	
Defendants	)	

**Declaration Relating to Expert Testimony**

Now comes George Korbel who affirms, declares and deposes as follows:

1. I have been a lawyer for 51 years and for the past 48 years I have appeared as either a lawyer or an expert witness in well over 100 voting cases in Texas. These have included testimony on racially polarized voting, socio-economic and educational discrimination, gerrymandering, the History of election discrimination in Texas as well as the creation and analysis of election districts. I have appeared as an expert and/or a lawyer for both plaintiffs and Defendants.
2. In 1974 I was one of the witness who testified before committees of both houses of Congress laying out the factual record to support the extension and expansion of the special provisions of the Federal Voting Rights Act to include Texas.
3. After the 1975 enactment of the extension and expansion of the Voting Rights Act I was asked by the Federal Election Commission to serve on a committee to determine best practices in the implementation of the language provisions of the Voting Rights Act.
4. In 1981 I offered congressional testimony on the need to preserve and extend the special provisions of the Voting Rights Act to include Texas.
5. In 1981 I was called to testify before a Committee of the US House of Representatives considering the factual and legal factors involved in the extension of the Voting Rights Act. I also offered testimony concerning the so called "attorney's fee" provision of the Voting Rights Act.
6. I have been hired by more than 50 jurisdictions in Texas to draw redistricting plans after the 2000 and 2010 census.

7. I have been involved in over 100 administrative cases involving the Voting Rights Act.
8. In this case as well as all other cases I was asked to testify and give opinions on:
  - A. The history of official voting-related discrimination in the state of Texas as well as cities school districts and other political subdivision in Texas.
  - B. The extent and historical effect that voting of racially polarized voting has had on Texas elections.
  - C. The extent to which Texas and its political subdivision have adopted and used voting practices or procedures that tend to enhance the opportunity for discrimination against the minority groups.
  - D. The effect and the presence or absence of candidate slating groups.
  - E. The extent to which minority group members bear the effects of discrimination in areas such as education, employment, and health, which hinder their ability to participate effectively in the political process.
  - F. The use of overt or subtle racial appeals in political campaigns.
  - G. The extent to which members of the minority group have been elected to public office in the jurisdiction.
9. Testimony I have given as well as articles I have written have been cited by several federal and state Courts. This has included three instances by the US Supreme Court in the interpretation of the act extending the special provisions of the voting rights Act to include Texas.
10. In this case I was asked to look at all and be prepared to testify on the factors in paragraph 8. In addition I was asked to examine the times and distances that Texans would have to travel to obtain the voting documents. I was asked to examine the efficacy of the translation used by the state Department of Public Safety. I was asked to look at and quantify other problems anticipated to be caused by the voter id statute.
11. In 2014 this Court issued an order finding that my then hourly fee of \$350.00 was reasonable. My current hourly rate is \$450.00 per hour.
12. In this case I devoted 186 hours to my preparation and testimony including drafting of an Expert Report. Much of the preparation was considerably shortened because I was able modify exhibits and research I did to testify in three-judge Federal Court litigation in the Western District of Texas involving the Texas State Senate, the State House of Representatives and

Congress.

Computation of a fee:

13. I spent a total of 186 hours on this case.

14. I first deducted the 15.5 hours that the state paid me for deposition and preparation. This is shown as blue on my attached billing statement.

15. I then deducted 49 hours involved in the preparation of an expert report. I understand this is being requested as an expense by the Veassey Plaintiffs. It is shown in tan on my attached billing statement.

16. That leaves a balance of 121.5 hours.

17. 121.5 hours at my current rate of \$450.00 an hour would be \$54,675.00.

18. 121.5 hours at my 2014 rate of \$350.00 an hour would be \$42,525.00.

19. In an exercise in billing discretion I chose to take 121.5 hours at my 2014 rate (\$42,525.00) and then reduce it by 50% which results in \$21,262.50.

20. Then I added in \$480.00 expenses.

21. This results in a total of \$21,742.50. This included 6 hours of travel time. The detail of these hours and charges are in the attached billing statement.

Further in this matter, I say not

/S/

April 7, 2019

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George J. Korbel

I first computed the total number of hours,	186.0	hours
Then I subtracted the 15.5 hours (shaded in blue) which the state paid as directed by this Court's Order -- preparation for deposition and deposition)	15.5	hours
Then I deducted 49 hours (shaded in tan) relating to the preparation of an expert report. The plaintiffs have sought this as an expense (advance to me of \$15,000.00)	49.0	hours
Total reduction in hours for deposition and preparation of expert report.	64.5	hours
Total billable hours less deposition and preparation of Expert Report (186 - 64.5)	121.5	hours
Current billing rate \$450.00 (121.5 times \$450.00)	\$ 54,675.00	
2014 billing rate at \$350.00 per hour (121.5 times \$350.00)	\$ 42,525.00	
Exercise of billing discretion (reduce 2014 billing rate by 50%)	\$ 21,262.50	
Expenses		
Travel to Corpus Christi (340 miles at \$0.75 per mile)	\$255.00	
Per diem and hotel	\$135.00	
Per diem	\$25.00	
Photo copies( 325 at \$.20 each)	\$65.00	
Pay this amount	\$ 21,742.50	



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March	Detail of time spent	HOURS
8	Analysis of time travel for each of 30 randomly selected counties. I took each of the Offices in the Counties of South Texas where the DPS voter registration is handled. I then determined the distance and time from each County seat to the nearest Motor vehicle office. I then examined the larges urban Counties Dallas Bear Dallas, Harris and Tarrant. Then I computed the time and distance from the office of each member of the House and Senate to the closest motor vehicle by city bus and by car.	2
9	continue	3
21	continue	1
22	continue	2
23	Conclude draft analysis of travel time	3
28	Review exhibits used in Statewide redistricting	1
29	Begin work on State and selected counties SES examine those used in Cong Case	2
30	Modify for potential use in this case	3
April		
4	Check the Texas History of Discrimination I had used the <i>Perez</i> case	1
5	Examine the gerrymander graphics used in Cong Case with graphics and data redo	2
6	Modify gerrymander <i>Perez</i> graphics or potential use in this case into draft format, Finalize change to History of Discrimination paper.	3
11	Examine AEIS (school testing scores for selected districts) used in <i>Perez</i> graphics for use in this case.	1
12	continue	2
13	Determine to modify and use SES, AEIS, gerrymander and history for report experiment with graphics. Organize. Examine racially polarized voting data and decide enough.	3
18	Consult with Dr. Susan Korbel additional ideas	1
19	Further examination urban areas of each state proof read).	2
20	Continue Modify for constituency	3
25	Review other expert reports I have done that are available I Decide to further expand add additional cases as well as to expand history	1
26	continue	2
27	continue	3



May	Detail of time spent	HOURS
2	Legal research (historic) continue	1
3	Legal research continue	2
17	Begin work on draft report	3
9	Attention to exhibits	1
10	continue	2
11	continue	3
16	Continue work on draft report	1
17	continue	2
18	continue	3
24	continue	1
25	continue	2
26	continue	3
30	continue	1
31	Preparation for meeting with Neil	2
June		
1	Begin to prepare for deposition	3
4	Confer with Neil on phone	2
6	work on draft report	1
7	Attention to exhibits	2
15	Meet with Neil and one of his clients supper with Neil and client	2
8	Further review of earlier depositions	3
13	Further data proofreading	1
14	proof reading of report	2
15	Send over draft	3
20	Work on Modify draft	1
21	continue	2
22	continue	3
24	Phone conference with Neil with preparation	2
25	Review draft filed report	1
26	Arrange and file documents	2
27	Reexamination and potential modification of report	1.5
July		
22	Review reports and pleadings, review of earlier works additional proof, proofreading of data, locate documents in drop box	3.5
23	continue	3
August		
1	Begin Prep for Deposition	1
2	continue	2
3	continue	3
4	Travel Preparation for meeting with Neil meet with Neil	4
5	Deposition with review, return to San Antonio	5.5
13	Meet with Neil, client Julia Benavides	2.5
29	Review possible slides modification as necessary for trial	1
30	continue	4
31	Organize file for final week before trial, review of slides that could be used. Review of data.	7

September	Detail of time spent	HOURS
1	Review Expert Reports check citations and numbers, review progress of trial	3
2	Continue, review other expert files, review progress of trial	3
3	Continue, prep of potential questions, review progress	3
4	Continue, reexamine case law, review progress of trial	4
5	Continue, notes for trial prep session, final organization of testimony, organize notebooks for trial, final review of slides review progress of trial	3
6	Final Organization of Testimony	9
7	Travel to Corpus Christi confer with other counsel , prepare with Chad and Neil	10
8	Final prep, attend trial, Testify meet with counsel travel to San Antonio	12
9	Organize file	3
		186